

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CARLOS ABREU

Plaintiff

VS

AMENDED
COMPLAINT

KOVIN J. BROWN (DSS Wende) CIVIL NO. 14-CV-6599
 ROBERT HAMILTON (C.O) Wende
 EDWARD MEYER (Capt Wende) JURY TRIAL DEMANDED
 JEFFREY KEENAN (L.T) Wende
 Michael Lucas (LT) Wende
 JACK Meara (Sgt Wende)
 Danielle Hodges (Sgt Wende)
 John Lempke (Supt Wende)
 Elizabeth Blake (INSTITUTION SUPERVISOR) Wende
 Michelle Ambrosoli (Nurse Administrator Wende)
 Paula Bozer (Physician/Doctor Wende)
 Rosalyn Killenger (DEPUTY SUPERVISOR FOR HEALTH) Wende
 Alfredo Kua (Physician/Doctor Wende)
 Stanley BUKOWSKI (Physician/Doctor Wende)
 Nicole Fink (Occupational Therapist Wende)
 Eileen Fucina (Nurse Administrator Wende)
 Steven Furloni (Education Supervisor Wende)
 Sarah Godfrey (Physical Therapist Wende)
 Timothy Gorny (Nutritional Administrator Wende)
 Joel Groden (Senior Librarian Wende)
 Nicole Henry (DOLCS Housing Officer Wende)
 Michael A. Hill (ASSISTANT DSN/PRES. COMM. Wende)
 Scott Leuthe (Medical Nurse Practitioner Wende)
 Jacqueline Levitt (Facility Health Service Director Wende)
 Leslie Lisson (OMH Social Worker Wende)
 Danielle Parker (Physical Therapy Assistant Wende)
 Jennifer Rivera (OMH Social Worker Wende)
 Jennifer Haggerty (OMH Social Worker Wende)
 Arnold Robinson (OMH Nurse Administrator Wende)
 MR. Beebe (Sgt) (GMCF) #11

J. WESTON (CORRECTION OFFICER AT GREAT HORNOR)
BRYAN HILTON (ASSISTANT COMMISSIONER (DOCS ALBANY))
MS. REDDING (NURSE OF INFECTIONS DISEASE (DOCS ALBANY))
JILL GRANT (RISK MANAGEMENT SPECIAL (OMH/GRACE HORN))
MR. J. IVES (OMH CLINICIAN AT GREAT HORNOR/GRACE)
MS. PAL (OMH PSYCHIATRIST AT GRACE)
MR. JACKSON (OMH UNIT CHIEF AT GRACE)
ALBERTO PAOLINO (DOCS PHYSICIAN (DOCTOR AT GRACE))
DAVID KARANDY (FACILITY HEALTH SERVICE DIRECTOR/GRACE)
MR. THOMS (FIRST DEPUTY SUPERINTENDENT AT GRACE)
KEVIN P. BRUEN (DEPUTY COMM. COUNSEL DOCS ALBANY)
C. BASCUL (SHU SERGEANT AT GRACE)
JEFFREY NABORZNY (CAPTAIN AT GRACE)
MICHAEL LYONS (SHU SERGEANT AT GRACE)
MR. DEPOLA (CAPTAIN AT GRACE)
MICHAEL GONYEA (CORRECTION OFFICER AT GRACE)
P. MELLEGIO (DEPUTY SUPERINTENDENT FOR PROGRAM/GRACE)
R.D. EASTMAN (DEPUTY SUPERINTENDENT OF SECURITY/GRACE)
C. MILLER (SUPERINTENDENT AT GRACE)
MR. CLEVELAND (CAPTAIN AT GRACE)
MARI HARRIS (NURSE ADMINISTRATOR AT GRACE)
CARL J. KORNIGSMANN (chief DOCTOR AT DOCS ALBANY)
CARRICK N. JACKSON (OMH UNIT CHIEF/SULLIVAN CR)
MS. COLLINS (ASSISTANT OF DSR & MENTAL HEALTH (GRACE))
L.T. WILLIAMS (LIEUTENANT AT GRACE)
L.T. BIRRELL (LIEUTENANT AT GRACE)
L.T. SCANLON (LIEUTENANT AT GRACE)
L.T. VLADYKOS (LIEUTENANT AT GRACE)
Sgt. R. LOWRY (SERGEANT AT GRACE)
Sgt. J. BYERS (SERGEANT AT GRACE)
Sgt. S. LEONARD (SERGEANT AT GRACE)
ROBBIE MR KELMAN (ROBBIE AT GRACE)
MS. PEACOCK (DEPUTY SUPER ADMINISTRATION (GRACE))
EDWARD BURNETT (DEPUTY SUPER SECURITY (SULLIVAN CR))
WILLIAM F. KEYSER (SUPERINTENDENT AT (SULLIVAN CR))
GAILE WILLIAMS (DEPUTY SUPER ADMINISTRATION (SULLIVAN CR))
JAN SZABLIK (CORRECTION OFFICER AT (WENDE CR))
PATRICK CONNOLLY (SERGEANT AT WENDE CR)
LARRY WYZYKOWSKI (OPTICIAN AT WENDE CR)
LAURA SOWA (LIEUTENANT AT WENDE C.F)
LESLIE LISBON (OMH CLINICIAN AT WENDE C.F SHU)
MS. BOALL, OFF INV. (DOCS ALBANY) # (2)

J. TELESCO (Lieutenant at Great Meadow)
C. BOICE (Medical nurse at Great Meadow)
Sgt. EVANS (Sergeant at Wende C.F.)
BRIAN FREEMAN (Sergeant at Wende C.F.)
PAUL REID (Correction Officer at Wende C.F.)
JOYCE KRYGIER (Officer of FOCC request/Wende C.F.)
MICHAEL HEDGREN (Correction Officer/Wende C.F.)
HENRY MAGYAR (Correction Officer/Wende C.F.)
WILLIAM GREGOIRE (Sergeant at Wende C.F.)
MICHAEL LUCAS (Lieutenant at Wende C.F.)
MARY GEARY (Medical Nurse at Wende C.F.)
CINDY FERRON (Inmate grievance supervisor/Wende C.F.)
JEFFREY HELL (Counselor supervisor at Wende C.F.)
LISA LA PERINA (Medical nurse at Wende C.F.)
TAMARA DAVIS (Medical nurse at Wende C.F.)
Randall Labeledz (Lieutenant at Wende C.F.)
MARYLISA HAYDEN (Medical nurse at Wende C.F.)
JEFF MCKOY (Deputy Commissioner Program ^{DOC} /Albony)
DEBORA MENNING (Risk Management Specialist ^{OMH} /Engloc)
MAUREEN BOSCO (Executive Director OMH / NYPC MCR)
KEVIN ROSPLOCK (Correction Officer at Wende C.F.)
K. LIPKA (Medical nurse at Great Meadow C.F.)
S. HAVENS (Medical nurse at Great Meadow C.F.)
M. ROGUE (Medical nurse at Great Meadow C.F.)
L. LAFRESCHE (Medical nurse at Great Meadow C.F.)
P. PINK (Psychiatric nurse of OMH at GMCR)
R. LECLOIRE (Psychiatric nurse of OMH at GMCR)
R. BRUNELLE (Medical nurse at Great Meadow C.F.)
M. VAN ORDER (Medical nurse at GMCR)
C. WATKINS (Medical nurse at GMCR)
ANN MARIE T. SULLIVAN (OMH Commissioner Albony)
DEBORAH J. McCULLOCH (Executive Director NYPC)
MEaghan BERNSTEIN (Risk Management Specialist ^{OMH} / NYPC)
JASON D. EFFMAN (Associate attorney ^{Albony} / NYPC)
MEGAN YAIRES (DOCCS Regional Health Services Office (Albony))
MS. YOUNG (DENTIST / DR at Great Meadow)
LINDA HOLMEN (Education Director at DOCCS Albony)
RICHARD MONTES (Chairman Office language at DOCCS Albony)
ALEXANDRA KUINLAN (Inmate grievance supervisor / GMCR)
NEW YORK STATE
N.Y.S. OMH AND N.Y.S. DOCCS
Defendants.

Cheryle Morris (DIRECTOR MINISTERIAL (DOCS ALBANY))
 Richard Monter Chairman (DOCS OFFICE LANGUAGE ACCESS/ALBANY)
 MARY J. D'SILVA DIRECTOR OF DENTAL SERVICES (DOCS ALBANY)
 H. McCarthy (OMH SOCIAL WORKER / Great Meadow CF)
 J. Winner (DOCS COUNSELOR/OCR AT GREAT MEADOW)
 CHIEF OF SPECIAL INVESTIGATION / INSPECTOR GENERAL (DOCS ALBANY)
 Susan Schumacher (DEPUTY SUPERINTENDENT ADMINISTRATION/WENDE)
 Margaret Stirk (UNIT CHIEF OF OMH AT WENDE CF)
 Debra Stubeuse (Physician / DOCTOR AT WENDE CF)
 Todd Adams (ACTING DIRECTOR OF RISK MANAGEMENT / OMH)
 Diane Toporek (MEDICAL NURSE ADMINISTRATOR / WENDE CF)
 Dennis Wahr (Physician Therapist AT WENDE CF)
 Stephanie Roman (CORRECTION OFFICER AT WENDE CF)
 Robert Skubis (SITU COUNSELOR AT WENDE CF)
 Jeffrey Mayer (CORRECTION OFFICER AT WENDE CF)
 M. Hawk (Sergeant AT GREAT MEADOW CF)
 DARRIN MC GUIRE (LIEUTENANT AT WENDE CF)
 ALAN HERZIK (LIEUTENANT AT WENDE CF)
 Taylor Roberts (Sergeant AT WENDE CAR, FSC)
 K. White (FOLIC OFFICER AT GREAT MEADOW CF)
 Latasha Johnson (CORRECTION OFFICER AT WENDE CF)
 Ted Jentz (CORRECTION OFFICER AT WENDE CF)
 Dean Morris (Sergeant AT WENDE CF)
 Lewis Urban (SUPERVISOR COUNSELLOR AT WENDE)
 Sergio Vazquez (CORRECTION COUNSELOR AT WENDE)
 DIRECTOR OF NURSES NEAL (AT WENDE CF)
 MR S. SIMMONS (CORRECTION OFFICER AT WENDE)
 B. Wilson (Law LIBRARY OFFICER SURVEYOR/WENDE)
 Stephen Ash (REGIONAL HEALTH SERVICES ADMINISTRATOR (ALBANY))
 MR VOLLMER (MEDICAL NURSE AT WENDE CF)
 Shawn Hyland (CORRECTION OFFICER) (AT WENDE CF)
 Albert Prock (SITU DIRECTOR AT DOCS ALBANY.)
 D. Venetozzi (SITU DIRECTOR AT DOCS ALBANY)
 Karen Crowley (DEPUTY SUPERINTENDENT PROGRAM (WENDE))
 Karen Bellamy (DIRECTOR OF GRIEVANCE PROGRAM (WENDE))
 J. Hale (ASSISTANT DIRECTOR OF GRIEVANCE PROGRAM (WENDE))
 Nancy J. Heywood (ASSISTANT OF DEPUTY COMM. COUNSEL OFFICE/FSC)
 J. Arliss (Hand SPECIALIST / ORTHOPEDIST AT SULLIVAN CF)
 Maria Diaz (PHYSICIAN ASSISTANT AT SULLIVAN CF.)
 GINGER EGGIER (NURSE ADMINISTRATOR AT SULLIVAN CF)
 Wladyslaw Sidorowicz (FOCUS HEALTH SERVICE DIRECTOR/SULLIVAN)
 P. Sullivan (Law LIBRARY OFFICER AT GREAT MEADOW CF)

- 1) All the Defendants have acted and continue to act under color of state law at all times, Relating to this Complaint.
- 2) All Defendants are DOCS and OMH staff officials, employees and personnel, and they are sued in their individual capacities.
- 3) The Defendants New York State, The Department of Corrections and Community Supervision (DOCS) and the Office of Mental Health (OMH) are ports of the United States of Northern America, and they are sued in their individual and official positions.
- 4) The Plaintiff Carlos Abram (Abram or Plaintiff) is a prisoner in the state of New York in the custody of the N.Y. DOCS and N.Y. OMH. States upon personal knowledge as to his action and upon information and belief as to the actions of others as follows for his complaint against the Defendants in this action.

PRELIMINARY STATEMENT

- 5) This is a civil action for damages for matters occurring while Plaintiff was incarcerated at Wende Correctional Facility, Sullivan Correctional Facility and Great Meadow Correctional Facility (Wende, Sullivan, and Great Meadow) -

— UNDER 42 U.S.C § 1983 alleging, inter alia deliberate indifference to Plaintiff's medical and mental health needs in violation of the Eighth and Fourteenth Amendments; physical and psychological abuse; violation of Plaintiff's Fourteenth Amendment Equal Protection Rights rooted in discrimination based on his mental illness race and ethnicity; violation of Plaintiff's First Amendment Right to Religious Means access to the law library, access to the court, and access to reading materials law books legal materials papers and legal documents Plaintiff also alleges unjustified, excessive and improper use of force sexual abuse sexual assaults and sexual harassments by numerous Defendants, who has also conspired and retaliated against Plaintiff while Plaintiff was confined in the special housing unit ("SHU") and mental health unit ("MHU") at Wende Sullivan and Great Meadow Correctional facilities.

11 11
Jurisdiction

6) This is a civil action authorized by 42 U.S.C. § 1983 to redress the deprivations and assaults listed above, under color of state law and rights secured by the Constitution of the United States. The Court has jurisdiction over the Plaintiff's claim under 28 USC §§ 1331, 1333(3), and (4) and 2201, and under 42 U.S.C. § 1983.

7) The Court has supplemental jurisdiction — over the Plaintiff's state law claims under

- 28 USC § 1337. AND THE COURT HAS JURISDICTIONS TO HEAR JOINED/ED CLAIMS & DEFENSES UNDER FED.R.CIV.P 18 & 30(a)

VENUE

8) Venue is proper pursuant to 28 USC § 1331 (b).

FACTS

9) ON OR ABOUT JULY 15/2014 ABREU WAS TRANSFERRED TO WENDE CF SITU. FROM AUBURN CF SITU (BOX TO BOX TRANSFER).

10) ABREU ARRIVED TO WENDE SITU WITH A MEDICAL PRESCRIBED MEDICATIONS AND MEDICINES OF LIPITOL / ATORVASTATIN FOR HIGH CHOLESTEROL. CLORAZIN FOR ALLERGY AND NABUMETONE FOR HIS PAIN PROBLEMS. HE ALSO HAS A PRESCRIBED ASTHMA INHALER FOR HIS ASTHMA PROBLEMS.

11) ABREU WAS TESTED IN AUBURN CF SITU FOR TUBERCULOSIS AND ON OR ABOUT JULY 10/2014 **THE TEST** CAME POSITIVE (T.B. POSITIVE) AND ABREU WAS IMMEDIATELY PLACED IN T.B. MDRS. FOR TO BE TAKEN FOR NINE (9) STRAIGHT MONTHS (PRESCRIBED FOR NINE STRAIGHT MONTHS) OR FOR ONE YEAR / 12 MONTHS / STRAIGHTS.

12) THE T. B. MEDICATIONS CONSIST OF INT 900MG AND B6. VITAMINS FOR AVOID THAT THE T. B. GET ACTIVE. ABREU WAS SUPPOSED TO TAKE THE MEDS TWICE (TWO/2) TO THE WEEK, DELIVERED BY A MEDICAL NURSE(S).

13) ON JULY / 17 / 2014 A SECOND T-B TEST (T-B TEST) WAS CONDUCTED IN WENDE C.R. SHU. AGAIN BECAUSE THE DEFENDANT DOCTOR LEVITT DID NOT BELIEVED THE FIRST T-B TEST TAKEN IN AUBURN C.R. SHU. HOWEVER THE TEST WAS AGAIN POSITIVE. SO THE GUARDIAN CAME TB POSITIVE AND THE DR. LEVITT SPOKED WITH THE DEFENDANT DR. KORNIGROHN IN CENTRAL OFFICE ALBANY / DOCS EXPLAINED TO HIM THE PROBLEMS THEN THE T-B MEDS WERE AGAIN APPROVED AND DR. LEVITT AGREED TO RE-PREScribe THE T-B MEDS. AFTER SEVERAL DAYS DENIED ABRAM HIS T-B MEDICATIONS.

14) THE DEFENDANT DR. LEVITT THE DR. BOZER THE DR. BUKOWSKI, THE NURSE PRACTITIONER LUTHE, THE NURSE ADMINISTRATOR FUCINA, THE DR. STUBERSC, THE NURSE ADMINISTRATOR TOPOREK, THE NURSE PRACTITIONER OBERMAN, THE MEDICAL NURSE MR VOLLMER, THE MEDICAL NURSE LARSEN, THE MEDICAL NURSE TOMORA DAVIS, THE DIRECTOR OF NURSE NEAL AND DEPUTY SUPERINTENDENT FOR HEATH SERVICES AT WENDE C.R. THEY REFUSED INTENTIONALLY AND IN BAD FAITH DENIED ME MEDICAL CARE TO ABRAM MEDICAL CONDITIONS, DENIED ABRAM HIS MEDICATIONS, DENIED HIM REGULARLY SICK CALL SERVICES, DENIED HIM HIS T-B MEDS, DENIED HIM HIS ASTHMA INHALER HIS LIPITOR AND / OR CLARIZIN MEDS, REFUSED TO RE-PREScribe HIS ORTHOPEDIC BOOTS BACK BRACE HAND BRACE DENIED TO MR ABRAM TREATMENT FOR HIS CHRONIC PAINS IN LOWER BACK, HIS LEFT ANKLE, FOOT AND TREATMENT FOR HIS BLEEDING AND PAIN IN HIS ANUS RECTAL / STOOL

15) The defendant is DR. Levitt. She is the Facility Health Service Director at Wende C.F. And she alleged and told me that she was Directed and ordered by the Deputy Superintendent for Administration M.S. Schumacher, the Deputy Superintendent for Health Services, Mr. Killinger, the Superintendent Lomax, and DR. Koenigsmann, don't give Abren nothing or limited medical care because Abren has two (2) pending lawsuits in the Western District Court, where the Superintendent Lomax is a defendant along with DR. Koenigsmann and other DOCS officials. Also she alleged that the Counsel Office and the N.Y.S. Attorney General's Office has recommended and ordered to do so.

16) in fact the defendant DR. Levitt has written an affidavit against Abren, about and regarding to the pending lawsuits in the Western District Court in Abren v. Farley Docket No. 11cv6251 consolidated with Abren v. Contrary the which she gave it to the N.Y.S. Attorney General's office Mr. Hillel Deutsch, so that it is very clear, there is a conspiracy and retaliations against Mr. Abren and a deliberate inaction to his medical needs, care, safety, well being, welfare, and health.

17) The defendant Mr. Killinger gave to Mr. Abren a similar response that all this came from DOCS officials DR. Koenigsmann and the Attorney General's Office, the DOCS Counsel Office Mr. Heywood, and Mr. Beninger, who is also a defendant, in Farley case

18) The Defendants Levitt And The Other medical Defendants ~~Started~~ And They Continued With Their Open misconduct And Violations Of My Rights From July / 2014 To April / 2015 because ~~In April 2015 Mr~~ Abreu Was transferred To Sullivan Cf

19) The Defendants Levitt And Wyzykowski Also Denied Abreu His Prescription Eye glasses With Photo Rays / Tinted Lenses That Mr Abreu Was In Need. And That Were Missing And Lost By Prison Officers In The Sun. Mr Abreu Was Suffering Of Strong Headaches Double Visions Unable Con Read Well Unable Con To Focus Objects Pains In Both Eyes Due To The Light And Sun Light But They Also Ignored Abreu Complaints And Conditions Even Abreu Showed To They Documentary Evidence That He Is Entitled To Receiving Such Lenses.

20) The Defendants Nicole Pink And Godfrey Were Denied Abreu Physical Therapy And Occupational Therapy Due Which Abreu Was In Need. Mr Abreu Had A Hand Surgery In March / 2014 Due To A Broken Hand. And Abreu Has Also Diagnosed With 'Suffering Of' Carpal Tunnel Syndrome, And The Dr / Surgeon Who Has Conducted The Hand Surgery In March / 2014 Has Recommended And / Or Ordered Pain Medications Physical Therapy And A Hand Brace, But The Defendants Pink, Godfrey Levitt, And Killenger Has Failed Or / And Refused To Follow The Recommendations Directions / Or Orders & Prescriptions Of The Surgeon / Orthopedist, And Special(ist) And Doctors From Out Side Hospital And From Other Correctional Facilities.

21) The Defendants Jennifer Rivera - Jennifer Haggerty, Leslie Lissón, AND Margaret Stark were denied Abreu Spencer mental health care and they were denied Abreu his mental health/psychiatric needs, refused to stop Abreu MR Abreu cells in the SHU refused to talk with MR Abreu refused privacy mental health interview with MR Abreu writing multiple false tickets to MR Abreu in reacations for his numerous grievances and complaints against the AND DOCS AND ONH STAFF AND OFFICERS AND THEY ALSO THREATENED Abreu AND CAUSED many INCIDENTS Abuser AND assaults that Abreu was suffering in the hands of PRISON OFFICERS in WENDE C-F SHU, AND THE MISCONDUCTS OF MEDICAL STAFF AGAINST Abreu. THE MISCONDUCTS AND VIOLATIONS, AND DELIBERATE INDIFFERENCE FROM THIS DEFENDANTS CONTINUED FROM JULY/2014 TO /THROUGH OF MARCH - APRIL 2015, PLACES ABREU MENTAL CARE, SAFETY WELL BEING, WELFARE, IN AN IMMINENT DANGER.

22) The Defendants Rivera/Haggerty, she has written also several ticket reports in the year 2012 in the SHU at WENDE AND WAS DOING THE SAME OR SIMILAR MISCONDUCTS AND VIOLATIONS OF ABREU RIGHTS WHEN ABREU RETURNED TO WENDE C-F SHU IN JULY/2014.

23) The Defendants Hamilton, Mayer, Skubis & Powell were sexually harassed with IMPROPER AND SEXUAL MISCONDUCTS AND BEHAVIORS IN DIFFERENT INCIDENTS HARASSMENT BETWEEN THE SHU AND THE MHU AT WENDE C-F IN THE YEAR 2014 (JULY 2014) TO / THROUGH MARCH 1/2015

24) The Defendants HAMILTON, SZABOLICK AND RASPLICK were Burned Abren with hot water, Denied Abren his meals AND Food, damaged OR/ AND Destroyed Abren legal papers, with waters in retaliations for Abren file grievances AND 'complaints against them AND other staff in worse c

25) Abren wrote grievances AND complaints REPORTING THAT C.O. HAMILTON HAVE REVERSED ITORASSED TO Abren FROM January 1 2015 TO/ THROUGH MARCH 2015 called TO Abren his Mommi his Bitch his little girl AND asked Abren TO Suck his penis AFTER C.O. / STARTED TO TOUCHED Abren BUTTICK INTENTIONALLY DURING ECONTS/ NOT FRIST.

26) ON MARCH 104/2015 THE INSPECTOR GENERAL INVESTIGATOR (OSI INV.) AND THE SGT MORA INTERVIEWED Abren SEPARATELY IN AN PRIVATE / INTERVIEWS ROOM IN LOCATED AT THE SHU AT WILDE OF Abren DEFENDANT HAMILTON, AND COUNSELOR MR SKUBIT SEXUAL MISCONDUCTS AGAINST Abren IN THE SHU.

27) Abren Explained IG/OSI INV. AND SGT MORA THE HAPPENED TO HIM. / AND THE MURPLY HORAEMENTS MISCONDUCTS AND ABUSES AGAINST Abren, BY THE DEFENDANTS.

28) However APPROXIMATELY between 20 TO 30 MINUTES AFTER THE INTERVIEWS WITH OSi INV. AND SHU SGT MORA THE C.O. HAMILTON WALKED FRONT Abren cell gave TO Abren A LOOK LIKE HE WANT TO KILL Abren. AND MAKE SIGNS OF THREATS. AFTER C.O. HAMILTON WALKED BEHIND Abren cell VIK THE CAT WALK BEHIND THE CELL WALL.

29) The Defendant Hamilton then called to MR Abren yelling screaming and saying "I will go to kill you fucking Bitch" "I will go to catch you fucking Homo, then Abren listen and heard a lot of stronger voices behind his cell sink And toilet the voices coming behind Abren sink - voices that are connected to in one piece attached to the cell wall from where C.O Hamilton was the area of the cat walk, then a lot of cold waters were coming out from Abren sink hole in a way that the water was touching his cell ceiling cell door bars, And in a lot of pressured the water was hitting on my cell areas' from the ceiling to Abren bed clothing - legal materials / papers legal books (Abren has approx 22 bags of legal materials inside of his cell in situ) And the water was hitting Abren rod

30) When the water stopped Abren heard to C.O Hamilton said yes bitch taken it after C.O Hamilton walked front Abren cell looked the cell all wet. And he smiled too. He walked again back to the cat walk / And put more waters in Abren cell. Again all intentionally And in bad faith.

31) On March /05/2015 early in the morning approx between 6:30 AM to 7:30 AM while Abren was sleeping or rested / on his bed also of hot waters stored to coming from his sink the water was extremely hot. The hot water hit Abren body, burned him in different parts of his body.

32) the hot water provoked injuries and pains on abren skin and bed abren heard again the voice of c.o. hamilton yelled or screamed saying yeah bitch abren turned his cell light on and saw all his bed body cell property legal papers / books completely wet of hot of water on the floor too abren was crying due to his pains his skin and face area were very red.

33) the c.o. hamilton then yelled and say yes, bitch cry like a little bitch and the c.o. hamilton left after the water stopped, laughed too, about all this.

34) the c.o. hamilton and c.o. seabuck were delivered / served the breakfast in the sta approx 15 to 30 minutes after the assaults with the hot water when they arrived front abren cell (abren was located in the last cell of the sta gallery) he asked to them for medical assistance and emergency sick call services but they were ignored abren request, smiled and looked each other, they gave abren on styro-foam tray and a cup, ^{< "a} styro-foam cup [>] when abren opened they it was full of wet toilet papers. they laughed a lot. they don't give abren no foods in all for two or three consecutive days they make intentionally and maliciously and were saying and ordered to the medical nurses and mental health stores don't report the incidents and don't report my complaints in the records. also this defendants were sending to other guards also to harass abren.

35) The Defendant Rosblock, a correctional officer in Wende CR SHU, HE ALSO BURNED Abren WITH HOT water ON 3/05/2015 in THE SHU IN THE AFTERNOON AFTER THE DINNER WAS SERVED IN THE UNIT. THE CO'S WERE ONLY SERVED Abren HOT TOILET PAPER BUT NOT FOODS IN ALL IN SUCH STYRO-FOAM TRAYS AND CUPS.

36) THE CO. Rosblock YELLED Abren FROM BEHIND THE WALLS OF Abren cell VIA THE CAT WALK SAYING THE CO Hamilton MR SKUBIS AND Sgt Hodges send you a message then also of HOT water in form of STREAM STORED TO COMING OUT FROM Abren SINK Hole, IN PRESSURE, AND HE KEEP IT ON FOR A long PERIOD OF TIME WHILE MR Abren was YELLING AND SCREAMING STOP STOP STOP PLEASE YOU ARE BURNED ME WITH THE HOT water, IT IS BURNED MY BODY STOP, STOP, BUT THE STREAM OF HOT water CONTINUED AND Abren ONLY HEARD AND LISTEN TO C.O. Rosblock SAYING "SUCK MY DICK Bitch, DIL, DIL DIL Ha, Ha Ha Ha. Then Abren YELLED BACK TO HIM SAYING YOU WILL GO TO JAIL IF I DIL AND YOU WILL GO TO JAIL AND LOSE YOUR JOB ALSO BUT ONLY RESPONDED Abren "I AM READY TO GO TO PRISON Ha, Ha, Ha, Ha.

37) THE C.O. Rosblock HE PASS ALL THE NIGHT BACK AND FORTH DO THE SAME THINGS OVER AND OVER FROM 6:00 PM TO 10:30 PM TO 11:00 PM (THE CHANGE OF SHIFT) HE ALSO DENIED ABREN MEDICAL ATTENTIONS TO ABREN SERIOUS INJURE AND PAIN, AND ABREN ALSO FILED FOR SICK CALL

38) ON 3/06/2015 Abren report his injuries TO THE NURSE BUT CO. HARRISON ORDERED TO SHE DON'T REPORT ABREN INJURIES

39) The nurse was the RN. Gerry a female nurse that was CONDUCTED the sick call services in the SHU along with a new nurse (UNKNOWN name) AND the C.O. Harrison was SCARED both when Abreu REPORT TO RN ms Gerry about his injuries AND pains, in the begin she alleged that she saw Abreu injuries but C.O Harrison then ORDERED TO SHE DON'T REPORT Abreu injuries pains OR complaints SO SHE DON'T PROVIDED Abreu nothing in all SO BOTH Defendants ACTED OF A FORM DELIBERATE AND INDIFFERENT TO Abreu injuries AND pains AND AN OPER CONSPIRACY AND COVER UP placed so Abreu safety SECURITY HEALING WELL BEING WELL BEING CARE AND WELFARE IN AN IMMEDIATE DANGER.

40) The Defendants Hodges, Keenan, Brown, Crowley, Stirk, Killinger, Schumacher, Sowa, Fischer, E. Meyer, Lissom, Hoggett, Rivera, Vazquez, Lucas, Meora, Hill, Morais, Jentz, Roberts, Herdzik, McGuire, Hilton, Wilson, Reid, Skubis, Herbigson, J. Mayer, Freeman AND sensible HAS FURTHER KNOWLEDGE OF THE MISCONDUCTS OF THE C.O'S. Harrison, Mr Szablick, Rosnock AND STAFF MISCONDUCTS AGAINST ABREU DON'T FEEDING FOODS ABREU VIOLATE HIS RELIGIOUS FOODS/MEALS BURNED ABREU WITH HOT WATER FLOODED HIS CELL WITH HOT AND COLD WATER KEEPING THE HOT WATER IN A HIGH PRESSURE THE WHICH BURNED ABREU LIPS TONGUE AND FACE EVERY TIME ABREU TRYING TO DRINK WATER TURNED OFF HOT COLD WATER SO ABREU WAS ALSO UNABLE TO DRINK WATER THEY SAW WITH THEIR OWN EYES THAT THE WATER WAS IN HIGH PRESSURE WAS EXTREMELY HOT BUT THE DEFENDANTS IGNORED ABREU CONDITIONS OF A FORM DELIBERATE & INDIFFERENT

41) The Defendants Has also further knowledges that the workers were destroyed Abram legal marriage and the defendant struck only told Abram to keep stronger and file lawsuits reporting his conditions of confinement and staff misconduct against Abram added that "maybe the court can help you" that is what she told Abram. Also the Defendants has further knowledges of the false fabricated and manipulate tickets reports that staff and guards were writing to Abram and also further knowledges that the medical staff and nurses were denied Abram hit T-B medis Lipitor claritin pain medications and others medical care attention & treatment to Abram medical needs, but the Defendants covered up all this and ignored Abram health conditions of confinement and acted also of a form deliberate and indifferent to his complaints and multiply grievances explained the staff misconduct and abuses that Abram was suffering in the hands of corrupts and unprofessional staff officials & guards from July 2014 to March 2015.

42) The deponents above they regularly walk in the site and several work in the site and others make daily rounds in the site such as LTT and Captains and SGT/Supervisors so that it is impossible that they don't see/observe the incidents and it is possible that they don't have know - ledge about the incidents. Also supervi - tors and his team eg DSS DSA DSC his assistants make rounds one time in the week or more in the site and mental health staff make rounds daily so there report to them all this many times over. And over.

43) The Defendants Brown - Lempke - Meyer, Lucas - Meara - Roberts and Grower they placed Abren behind a plexiglass / cell shield and forced to Abren to use also a 'special suit' called 'exposure control suit'. The cell shield it don't has any holes' in the plexiglasses, provoked lack of air, lack of ventilation, lack of oxygen and lack of ventilation also from the vents and lack of heating from the out side / heat. And the special suit, it was provoked Abren a lot of problems, harassments sexual harassments threats from guards and other prisoners, denial of medical and mental services, denial of counseling services, unable con to go or receive recreations and visits, it also always was placed so tighted to Abren neck and throat provoked choking sensations, rash in his body, pains in his neck and throat because it used a lock behind the suit neck area type padlock and the suit was too heavyn **FOR** con to walk and too hot that it provoked also asthma attacks or respiratory problems.

44) However, even MR Abren reporting to the Defendants and medical stock his conditions and problems with the plexiglasses and special suit MR Abren was forced any way to wear the suit and be in a cell with lack of air ventilation and oxygen and heating in summers and winter time. They / the Defendants continued approved it every 60th weeks and every 30 days and regularly they refused to provide Abren with notices and orders of the special suit and cell shield order violated so, and Abren Due Process Rights and his U.S. Constitutional Rights.

45) The Defendants Roman Roberts Mender Skubis Stark J. Mayer Rivera Hoggerty, Lison and other staff at Wende CF were wrote multiple false tickers and reports to Mr. Abren in Retaliations for Abren grievances and multiple complaints against them. Then the Defendants HOF E Mayer, 'Hearst Hill Furlow were assigned to conduct the hearings (superintendent's hearing) appointed by Superintendent Lemake. However, each of the Defendants were violated Abren, Due Process and his Constitutional Rights to call witnesses to assistance and to assistance denied documents evidence and directives that Abren was in need excluded to Abren from his hearings, don't allowed to Mr. Abren to attend to his hearing or to participate in his hearings. Conducted the hearings in a form arbitrary, conscious bias, discriminatory, retaliatory and trying to cover up the Defendants Roman Roberts Mender Skubis Stark Rivera, Lison and Hoggerty and other staff misconduct violations and Abren's Against Abren from the Month of July / 2014 to March / 2015, violated so Abren, 1st, 8th and 14th Amend. Rights.

46) The Defendants (Rowley, Hill, Connolly, Wilson and Lemake) were regularly denied Abren's access to the law library, and access to the courts. They were denied Abren legal copies, legal passage, several law library materials, writing papers, monica insubers and carbon papers and other legal supplies and interfering with open cases, proceedings and actions in the courts that Abren has pending, and trying to impede that Abren can to continue with his legal activities and legal claims in the courts.

47) Abreu has been forced to abandon several of his actions lawsuits - cases and proceedings and others' cases, proceedings cases and lawsuits were dismissed due to the defendant's misconduct. They have clearly violated Abreu 1st and 14th Amend. Rights U.S. Const.

48) The Defendants Blake, Lemake and Schumacher were also missing - throw away &/OR NOT processed or/ And filed Abreu's facility claims about the damages, destructions and mishandled of Abreu legal proceedings books and magazines and papers for several defendants in Wende C/ Sita. They were also denied Abreu several of his claims including the missing of Abreu several bags of properties. The defendants were doing all this intentionally AND in bad faith in Retaliations AND for try to cover up some misconducts AND abuses against Abreu. violate so Abreu Constitutional Rights under the 1st, 4th, AND 14th Amend. Rights U.S. Const.

49) The Defendants Bordinoro & Vazquez were assigned to assist Abreu in his tickets but they also intentionally refused to provide Abreu with a good assistance, don't provided Abreu with many of his requests AND in several occasions don't come back to provide Abreu his requests. documents, papers & directives the Defendants also conspired Against Abreu along with the Defendants Reinhardt, E. Meyer, Hill, Urban, Henry AND HRF. in Wende C/ Sita in Denied Abreu the proper assistance in his tier III ticket reports. The Defendants has violated the 1st and 14th Amend Rights U.S. Const. AND violated also his due process rights, state regulations, AND the correction laws.

50) The Defendant Groden was denied Abren general library materials and denied Abren Spanish materials and the Defendant Fulton was also denied Abren Spanish materials and Bilingual Dictionaries Spanish - English - English - Spanish and denied Abren proper Civil Studies materials and Education all in Retaliations and Discriminations for Abren grievances and letters of complaints against they violated so Abren U.S. Const. Rights under 1st and 14th Amend. Rights and violate state laws and Federal laws and state and federal regulations.

51) The Defendant Perron she was regularly don't processes Abren grievances and Abren appeals to Superintendent and CORC she also was refused to make rounds in the SHU denied Abren direct access to the inmate grievance program she in conspiracy with the Defendants was trying to cover up staff, guard and officials abuse and misconduct and violations that Abren was suffering in the hands of corrupt and unprofessional Defendants in the SHU in Wende C. also all and each grievance complaints senting to the inmate grievance program are Readings and reviewed by IGP Supervisor ms Perron so she knows also of the Defendants' misconduct so she is part of the violations of Abren Rights when she get the knowledge of this violations through the grievances and assacs so her cover up places abren like safety security health well being welfare and care in an imminent danger. she and the Defendants Bellamy, Hale Lemire, Annauc & Crowley for violated Abren 1st 14th const Rights, of Regulations, laws + due

52) The Defendant Johnson was assigned to delivery legal mail (incoming legal correspondences) And legal materials from the law library. The regularity was missing Abren incoming legal mails or not delivered Abren his legal mails And law library materials that Abren required in the law library's forms also Abren filed multiple letters of complaints and grievances reported to the Defendants LEOPKE, BROWN, GROWLEY, JOWA, E. MEYER, CONNOLLY, FREEMAN, ROBERT, HODGES, MEYER, SKUBIS, SCHUMACHER, LUCA'S, KEENAN, MORRIS, HERZLIK, MCGUIRE, AND HILL, the misconduct and violations of the C.O. Johnson against Abren And his legal mails & L.C. Request (legal materials from law library) The which Abren believe were made in Retaliations And discriminations for Abren complaints And grievances against the And other staff And for the sign / plaque that Abren has front his cell with the word EXPOSER And because Abren was wearing the special suit. So the Defendants acted of a form deliberate & indifferent to Abren complaints And rights And violated Abren 1st And 14th Amend. Rights, state of federal laws of regulations.

53) The Defendant KRYGIER, along with the Defendants SKUBIS were denied Abren his FOIC Request for Review Hearing packets, video tapes video of incidents Hearing tapes documents directives And other papers all in Retaliations And in discriminations for priors grievances And complaints that Abren filed against they And other staff This Defendants has violated abren 1st And 14th Amend Rights. And state regulations, directives And laws

54) The Defendants Hill And Crowley
Are responsible of enforce the federal
law under PREA law to report to
law enforcement any incidents of sexual
assaults sexual harassment and rapes
suffering by prisoners in Wende CF/SHU
in the hours of prison staff, officials
and guards or other prisoners also they
has the obligations of to protect to
prisoners of any kinds of retaliations and
to conduct investigation to remove the
staff employee or officials /guards who
are 'sexually' assaulted harassed threaten
retaliated or raped to an inmate who
has reported such cases of assault/harass.
against the staff guards or officials. However
in Abreu case, they intentionally and in
bad faith ignored Abreu complaints and
reports of sexual assaults, sexual harassment
and retaliations from the Defendants Skubis
of Hamilton who were regularly sexually harassed
and assaulted and for retaliated against
Abreu in Sullivan CF SHU along with the
Defendant Mayer, who also was sexually harassed
Abreu from July 2014 to March 2015 violated
clearly Abreu 1st 8th and 14th Amend Rights. AND
violated the PREA law civil Right law. AND
placed Abreu in an imminent danger.

55) The Defendants Mary Goory, Lisa La
Penna, Tamara Davis, Marylissa Hayden
and other medical nurses in Wende CF/
SHU were regularly denied Abreu his meds
(prescribed medications) for T.B pains
meds, Lipitor allergy nasal spray denied
sick call services and refused to observe
and for report Abreu medical complaints
from July 2014 to the month of March 1 2015.

56) Abreu was placed also a several inadeguated and unlawful RESTRICTED DIET in wende of site for the Defendants. The RESTRICTED DIET not only was it inadeguated but also was the DIET lacked of NUTRITIONS, And the Defendants who sentenced to Plaintiff Abreu to RESTRICTED DIET in the DISCIPLINARY HEARINGS And the Defendants who offened such sentences has further knowledge that the DIET was inadeguated lack of NUTRITIONS And Abreu not was supposed to be sentenced to the RESTRICTED DIET because he was designed Level I MENTAL HEALTH by the OFFICE OF MENTAL HEALTH, when an INMATE is sentenced to RESTRICTED DIET also the MEDICAL STAFF AND NURSES ARE SUPPOSED AND MONITORED TO EXAMINE THE INMATE AND TAKE BLOOD PRESSURE AND WEIGHT, AT LEAST TWICE IN THE WEEK PLUS TO CHECK IN THE INMATE DAILY. but in Abreu case the Defendants NURSE refused to do so, placed Abreu health, care, safety, well being, SECURITY, AND WELFARE in an IMMINENT DANGER, AND THEY WERE DELIBERATE AND INDIFFERENT when Abreu reported his SYMPTOMS AND FED SICKCALL reported all this.

57) THE Defendants ANNUNZI, KOENIGSMANN, MCKEE, BILKANY, VENETTOZZI, PRACK, HOLLOWAY, GROSS, BOSCO, MANNING, CHIEF INSPECTOR general (CHIEF OSI), RAMIREZ - ROMERO, BOB HEYWOOD, ASH, N.Y.S. DOCS, N.Y.S. OMH, AND STATE OF NEW YORK AND MR HALE AND MR BRINICKER HAS FURTHER KNOWLEDGE OF OVI AND EACH OF THE THINGS THAT WERE HAPPENED TO ABREU IN WENDE OF SITE IN THE HOURS OF WENDE OF DEFENDANTS but even Abreu righting reported to they in letter (mainly letter of complaints) all the INCIDENTS, including in grievances they in RETALIATIONS, of INTENTIONALLY SUPPORTED EACH OF THE VIOLATIONS.

58) The Defendants Hamilton, Szablick, Mayer, Wilson, Connolly, Crowley, Freeman, Hill, Grode, Reid, Stark, Toporek, Wyzykowski, Hodges, Killinger, Krygier, Skubis, Schumacher, Mora, Sowa, Hibbs, Levitt, Magyar, Reinforder, Roberts, Gregoire, Blake, Lucas, Furlani, Geary, Fink, Fucina, Ferron, Heif, Lissom, La Penna, Meyer, Davis, Labeled, Vogelz, Haydn, Keenan, Lemire, Brown, Misez, Rosnock, Fischer, Ambrosoli, Boer, Kua, Bukowski, Fink, Fucina, Furlani, Godfrey, Gorany, Groden, Henry, Leuter, Lissom, Parker, Rivera, Hogerty, Robinson, Bordinato, Stark, Stobusz, Toporek, Wahr, McGuire, Herzik, Johnson, Jentz, Morris, Urban, Evans, Hyland, Vollen, and Simmons. (The Defendants in Wende C.F. / Shu)
They continue their misconduct against Abren until Abren was transferred to Sullivan CF Shu in an emergency transfer, in March 2015. After the Federal Judge Hon. Siroga from the Western District Court of New York USDC wrote a letter of complaint reported Defendants misconduct against Abren and his harsh conditions of confinement in March 17/2015 to Debra Martin, At in the Attorney General Office in Rochester with copy of Abren 3/08/15 letter and copy to Catherine Leahy Scott N.Y's Office of the Inspector General also were provided with a copy of the letter.

59) On or about April 01, 2015 Abren arrived to Sullivan CF Shu, with approx. 22 bags of legal materials, a hand brace, an Asthma inhaler, with prescribed medications and with a prescribed physical therapy, or recommendations for physical therapy.

60) UPON ABRON TRANSFER TO SULLIVAN CF. SHAW
THE DEFENDANTS BURNETT AND KERSEY WITH
THE SUPPORT OF THE DEFENDANTS HEYWOOD AND
BRENN CONFISSCATED ABRON LEGAL MATERIALS
AND ONLY ALLOWED AND LET ABRON RECEIVE
FIVE (5) BAGS OF LEGAL MATERIALS THE DOCS
COMMISSIONER ANNUNCI AND BELLINIZZ ALSO AUTHORIZED
THIS VIOLATIONS. THEY HAS FURTHER KNOWLEDGE
THAT THE WESTERN DISTRICT COURT HAS APPOINTED
ABRON PRO BONO COUNSEL AND THAT ABRON WAS
IN NEED OF ALL HIS LEGAL MATERIALS FOR HIM
TO ASSIST TO HIS COUNSEL TO RESPOND TO THE
MOTION FOR SUMMARY JUDGEMENT, SO, THERE WERE
A CLEAR CONSPIRACY BETWEEN THE DEFENDANTS
IN WENDE CF WITH THE DEFENDANTS IN SULLIVAN
CF AND THE DEFENDANTS IN DOCS ALBANY N.Y.
CENTRAL OFFICE, AND THE OFFICE OF THE INSPECTOR
GENERAL ASSISTANTS FOR TO IMPAIR AND INTERFERE
WITH ABRON CASES, LAWSUIT PROCEEDINGS APPEALS
AND PENDENT LAWSUIT (ACTIONS) IN THE WESTERN
DISTRICT COURTS, SO ALL WAS PLANNED AND ALSO
CALCULATED FOR THIS DEFENDANT.

61) ABRON MEDICAL PRESCRIPTIONS ALSO WERE
CONFISCATED AND DISCONTINUED OF A FORM
DELIBERATE AND INDIFFERENT BY THE DEFENDANTS
SIBOROWITZ, DIAZ, ARNOLD & EGGER IN CONSPI-
RACY WITH THE MEDICAL DEFENDANTS IN WENDE
CF AND THE DEFENDANTS KOENIGSMANN REDDING
AND THE DEFENDANTS ANNUNCI, BELLINIZZ, HEYWOOD
AND BRENN WHO ALSO APPROVED AND AUTHORIZED
THE DISCONTINUATIONS OF ABRON, T.B.
MEDICATIONS; ASTHMA INHALER, HORN BRACE, THE
ORTHOPEDIC BOOTS ABRON PRESCRIBED EYE GLASSES,
PAIN MEDICATIONS LIPITOR, CLORAZINE, LORATADINE
FOR DRY SKIN AND NASAL SPRAYS & THE RECOMMEN-
-DATIONS PA PRESCRIPTIONS FOR PHYSICAL THERAPY.
SO, THE CONSPIRACY IS VERY CLEAR BETWEEN THIS DEFENDANTS.

62) Abren was also placed in the ~~special~~ suit and sign / plague exposurer in Sullivan CR and placed behind a special plexiglass that don't allow ~~or~~ or do stork to observe hair or Abren bottom body. All this was ORDERED and APPROVED by the Defendants BURNETT, KEYER, ANNUGI, BONNIE, HEYWOOD, BRUNI, VENETTOZZI and HILTON who also authorized the special suit sign exposurer and others deprivations. They have also further knowledge that the control suit and sign exposurer are unconstitutional violated the 1st 8th and 14th Amend. Right violate clearly does ~~the~~ directives at 4433 and state regulations violate the equal protection the due process and the double jeopardy / ex post facto this provoke threats, denials of medical care, discriminations, abuses, retaliations and sexual harassments so the Defendants they continue the same misconducts that they has against Abren in worse of they continued this in Sullivan CR ~~the~~ intentionally in bad faith and in rotations places so Abren's overall well-being, Health, care welfare and security in an imminent danger.

63) While Abren was in Sullivan CR ~~the~~ from APRIL 2015 TO October 15, 2015. Abren suffered several physical and sexual assaults, lot of sexual harassments, threats, denial of sick call services regulated by medical nurses, denial of his medical and mental health / psychiatric meds, multiply fakers of manipulated and fabricated tickets reports, verbal harassment, discriminations, denial of mental health services, many cell searches, and others violations. so this is very clear that the special suit and sign place ~~and~~ put Abren in imminent danger.

64) The Contract suit was also provoked prior discomforts and other many problems include choking sensations, be placed to tightened to Abren neck and throat, problems for to work and too hot provoked respiratory problems and/or asthma attacks or symptoms of asthma. The special suit and regular plexiglasses were discontinued or stopped in Sullivan Co. Site of to be used against Abren, but this was due after Abren numerous complaints ripped the suits and approx one or two months before his transfer to Great Meadow Co.

65) The Defendants in Sullivan Co. and Doctor Charles Office officials. Defendants were doing same or similar misconducts and violations such as they were doing in Grade Co. Denied legal copies they also harassed Abren in legal postages and legal copies, denied proper and adequate medical and mental health care treatment and attentions also ignored Abren complaints and grievances intentionally and in bad faith in a type of retaliations and anti-criminality, they also were denied Abren FOIL requests - denied writing papers and envelopes the outgoing mails (legal mails and regular correspondence) were missing throw away and/or holding Abren mails, courts judges legal clerks legal organizations and attorneys not were received Abren mails and correspondence, also Abren several actions lawsuits and proceedings and appeals such eg Article 78 Court of claims state/federal Habeas corpus 28 USC § 1983 complaints and appeals were dismissed due to the Defendants misconducts against Abren.

66) The Defendants misconduct against Abreu
 Against his legal passenger legal copies
 Access to the courts access to the legal
 materials and legal supplier get worse
 for the months of August September and
 October 2015, when Abreu 'pro bono' counsels
 were working with Abreu for him to do his
 reply/opposition to Defendants summary judg-
 ments filed in the western district court
 of new York in the actions/cases Abreu
v. Farley, consolidated with count 10 case
 this order of interference and/or impeded
 this passenger legal copies legal supplier and
 access to the courts was/were opposed
 and/or ordered also for the Defendants
 Heywood; Bruan Annucci; Bellnier Koxys
 and the new York state Attorney General
 Office assistants from the Rochester area
 all was a plain conspiracy and on 10/20
 for to stop Abreu in his legal activities and
 try so, also of dismiss Plaintiff lawsuits appears
 claims, proceedings and actions, and denied to
 Abreu access to the courts and his attorneys
 and legal organizations violated so Abreu
 1st 4th 8th and 14th Amend Rights under
 directives, federal and state regulations and law

67) The Defendants Carrick N. Jackson
 Gail Williams Sullivan; Herring; Bosco
 McCullagh; Bernstein; Koenigsmann; Bellomy,
 Venetucci; Bellnier; Hale, Heywood; ~~Brue~~
 Annucci; State of New York; OHM 'DOCS'
 Hilton, McKoy; Tolman; FFYAN; Yavier; Chifost
 Sidorowicz; Diaz Eggers; ARISS; Burnett and
 Koyser, failed and refused to protect Abreu right
 security, safety, health, well being, welfare, care & life
 of properties, when Abreu suffered all the violations such as
 explained above, happened between weeks of Sullivan or other

68) The Defendants Has AND HAD FURTHER KNOWLEDGE THAT ABRAM W. CONSTITUTIONAL RIGHTS CIVIL RIGHTS HUMAN RIGHTS STATE & FEDERAL LAWS THIS REGULATIONS DIRECTIVES AND POLICIES OF THE DOCS AND AMT AND CNPAC WERE VIOLATED numerous times when ABRAM was subjected TO Abuses assault sexual assault sexual Harassment Denial of his medications medical AND Psychiatrics Denial of sick call services Denial of Alleged AND / OR Proper medical AND Mental Health Services MEDICAL AND Mental Health Staff AND NURSES MISCONDUCTS, DISCRIMINATIONS RETALIATIONS VIOLATIONS OF HIS RELIGIOUS KOSHER MEALS AND VIOLATIONS OF HIS RELIGION AND his belief Denial OR Impeded OR interference WITH ACCESS TO THE COURTS ATTORNEYS LEGAL OR - GATIONS LAW LIBRARY General LIBRARY EDUCATIONS Programs ASSISTANCE False AND FABRICATED AND EXAGGERATED MULTIPLE TICKETS/ REPORTS IN RETALIATIONS / DISCRIMINATIONS VIOLATIONS OF THE DOG PROCESS DURING THE - HEARING PROCEEDINGS, THE CONTROL SPUDS SURS PLAGUE / SIGN EXPOSING THE PROBLEMS WITH THE SUITS THE PROBLEMS WITH THE PLEXIGLASS / CELL SHIELDS - THE MULTIPLE CONSPIRACY AND CONSPIRACY OF CALCULATED HARASSMENTS AND CELL SHIELDS CELL SEARCHES DESTROY OF PROPERTIES MISSING MAILED THREATS THAT ABRAM SUFFERS between WENDE & SULLIVAN C.

69) The Defendants Learned OF ALL AND LACK OF THIS SERIOUS VIOLATIONS THROUGH VIAS OF ACROSS LETTER OF MULTIPLE GRIEVANCES / COMPLAINTS APPEALS IN PERSON IN THE SITE VERBALLY - VIA OTHER INMATES INVESTIGATORS REPORTS RECORDS AND SEVERAL OF THEY OBSERVED THE VIOLATIONS Abuser, mistreatments harsh conditions of CONFINEMENTS but they ignored all this of a form deliberate AND indifferent.

70) The Defendants in Sullivan C.F., And
The Defendants in Docs Central Office,
CNYPC OMT STATE OF NEW YORK DOCS
And this officers staff Employes Nurse
And Personnel, Continued with them abuse
Misconduct Retaliations Violations Harassment
Discriminations And Humiliations until
And still Abreu was transferred to
Great Meadow C.F. Site, in an emergency transfer
AFTER his last assault in Sullivan C.F. in the
hands of STAFF/guards (He suffered assault
Physicals in the hands of guards in the months
of September 2015 to October 2015)

71) On October 15 2015 Abreu was transferred
to Great Meadow C.F. Site in two mini-vans
one where he was transported under video -
Cameras hands along with a Sgt supervisor
And two C.O.s/guards And another for C.O.s
to transport his 27 bags of legal materials.

72) UPON ARRIVE in Great Meadow C.F. Site, Abreu
Pain medications Neurontin Prescribed to Abreu
Due to his chronic pains in his lower back right
Hand LEFT ANKLE/FOOT AND ARM were stopped
And Discontinued along with the medicines
for his high cholesterol, such as Lipitor &
Claritin for weather allergy were also Dis-
Continued totally by DR. Poolsma And DR
Koronyx. Abreu T.B. medications Nasal spray
Hand brace, Orthopedic boots back brace -
Lotions prescribed eye glaser were also
Denied Abreu without any Reasons or
Explanations or notifications in all. Also
all treatments for Hemorrhoid Bleeding &
pains were denied Abreu by the Defendants
So the Conspiracy Retaliations & continual Harassments
followed Abreu also to Great Meadow C.F. Site

73) Abren was placed in the SHU R1-27 cell. The cell door and box has already a cell shield/plexiglass waiting for Abren. Abren asked to the supervisors and CCR why a cell shield were placed front his cell box/door. They only responded and told Abren, "you know what you did in inside of SHU and Sullivan of SHU will see all your records and they call us and advised us who you are and DOCU Albany officials let know also who you are. Remember you are a CMC designation so Inspector General Office also advised us who you are before they approve the transfer and sent to you here."

74) Abren explained to them that any alleged incidents happened in inside of SHU of Sullivan of SHU don't have nothing to do with great reason of, because he don't have doing nothing wrong to no one here but they only responded to Abren we know who you are remember you was here in the past you have also or problem with work here. They remember you perfectly and you sold to them also in the past in the courts so believe me they don't have forgotten you." This was the explained Abren by super.

75) Abren was placed in a dirty cell contaminated with insects over all the floor sugar over all the floor ants over all the floor the toilet it was very dirty and the sink was also very dirty. The sheets provided Abren were also dirty. The liner/pillow case was dirty the colors of it sheets and pillow case were brown color, smell very bad, of pillow broken.

76) Abren was denied all cleaning supplies. The SHM SUPERVISORS Sgt. BASCUE, AND Sgt. LOWRY advised Abren that while he continue getting cell shields HE cannot to clean his cell/s ("no cleaning supplies") AND NO HOT WATER AND NO CELL BUCKET SO THEY ALSO PUT AND placed Abren in RESTRICTIONS OF ALL THIS ARTICLES AND ITEMS without Abren Don't Do nothing wrong in Great Meadow.

77) Abren was also advised that All his legal materials were confiscated AND that from the 27 bogs of hit ACTIVES legal materials HE ONLY will receive ONE bog. That it 'Abren explained that under DOCCS Directives Regulations AND THE LAWS AND Federal Constitution. Abren wrote also LETTERS OF COMPLAINTS TO THE DEFENDANTS MILLER Eastman DOCCS COMMISSIONER Annucci - DSD' Melucci - DSA; IRVAN - KONGSTROM; THOMAS KARONDI; Hollmen; Herwood; Bellnier; MR - Vannozzi; Chief of OSE; MCKEEY Hall, & Hinton explained the problems with hit MEDICAL PRESCRIPTIONS PAINS, STAFF MISCONDUCTS THREATS OF PHYSICAL ASSAULTS by guards AND SUPERVISORS / SGTS. The problems with the cell shield Cleaning supplies AND Abren legal properties / materials while Abren explained that all hit legal papers ARE ACTIVER cases HE HAS ALOT OF LEGAL DOCCS NOT COURT ORDERS TO FOLLOW but THE DEFENDANTS ABOVE REFUSED TO ACT TO Abren ACTED OF A FORM DELIBERATE AND INDIFERENT TO Abren serious conditions OR CONFINEMENTS AND THE MISCONDUCTS OF STAFF. Abren also advised to the DEFENDANTS, THAT HE IS NOT SUPPOSED TO BE IN GREAT MEADOW CE/SHM AND THAT STAFF HAS THREATENED TO THREAT Abren WITH PHYSICAL ASSAULTS, AND IT HAZED TO HIM TOO.

78) ON OCTOBER 16/2015 THE DEFENDANT MR IVES SPOKE WITH ABREN IN THE MHR OBS ROOM. MR IVES TOLD TO MR ABREN THAT NO ONE IS WHAT HIS IN GREAT MEADOW CF AND MR IVES ALSO ADVISED MR ABREN, THAT HE HATE MR ABREN BECAUSE MR ABREN SOED HIM IN THE PAST AND HE ALSO DONT WANT ABREN TO GO IN GREAT MEADOW CF MR IVES SAY ALSO TO ABREN THAT HE IS THE ONLY CLINICIAN ASSIGNED IN THE SHU AND THAT HE MAKE ROUNDS DAILY OF MONDAY TO FRIDAY, BUT THAT ABREN DONT EXPECT ANY HELP, ASSISTANCE OR MEDICAL HEALTH CARE FROM HIM OR OTHM STAFF IN THIS FACILITY BECAUSE ABREN HE NEED TO PAY WHAT ALLEGED ABREN DID TO HIM IN THE PAST. MR ABREN, ALSO REPORT TO MR IVES HIS CELL CONDITIONS, LACK OF VENTILATION, LACK OF CELL CLEANING, SUPPLIES, PLEXIGLASS, CELL DIRTY, SHEDS AND DEPRIVATIONS OF HOT WATER, LEGAL PAPERS AND MEDICAL STAFF MISCONDUCTS, BUT MR IVES RESPOND WERE I DONT CARE IF YOU DIE RIGHT NOW. I DONT CARE WHAT HAPPEN YOU IN THIS FACILITY NO ONE REALLY CARE ABOUT YOU. YOU HAVE A LOT OF ENEMIES HERE AND IN ALBANY (DOCS AND OTHS). WHAT DO YOU EXPECT WILL HAPPEN YOU HERE? NO BODY LIKE YOU, YOU KNOW THAT, MR IVES THEN SEND ABREN BACK TO HIS CELL IN THE SHU.

79) THE DEFENDANT MILLER AND REED, WROTE A LETTER TO MR ABREN ALLEGED THAT THEY COMMUNICATED WITH DOCS ALBANY AUTHORITIES, AND EXPLAINED THE PROBLEMS BUT THAT THEY ALLEGED THAT ABREN IS IN THE RIGHT PLACE AND RIGHT PRISON. ABREN WAS ALSO ADVISED THAT THE COUNSEL'S OFFICE (DEFENDANT'S HENWOOD AND MR BROWN APPROVED AND AUTHORIZED BY DEFENDANT ANNIE J. BENNING) THAT DOCS HAS HELD HIM IN LEGAL POSTAGE AND LEGAL COPIES, SO NO MORE ADVANCE REQUEST TOO.

80) The defendants waited Abren in legal Postages And legal copier is a clear PROOF AND EVIDENCE OF DOCS OFFICER/ Defendants interfering AND IMPEDED ABREN INTENTIONALLY AND IN BAD FAITH ACCESS TO THE COURTS AND ACCESS TO HIS ATTORNEYS/ COUNSEL'S APPPOINTED BY THE COURTS AND AN OPEN CONSPIRACY ALONG WITH THE ATTORNEY GENERAL ASSISTANCE INTERFERED & TRYING TO IMPED THAT ABREN WORK WITH HIS COUNSEL FOR TO RESPOND TO DEFENDANTS SUMMARY JIZ (JUDGMENT) IN THE ACTIONS /CASES ABREN V FARLEY CONSOLIDATED WITH COUNTRYMAN CASE AND FOR IMPED AND INTERFERED WITH ABREN OPEN CASE

81) They also placed him limited legal supplier LIMITED WRITING PAPERS LIMITED CARBON PAPERS LIMITED ENVELOPES, AND LIMITED ACCESS TO LAW LIBRARY MATERIALS NO LEGAL BOOKS IN ALL AND NO LEGAL ASSISTANCE FROM THE L.L. CLERK LAW. The Defendants P. Sullivan also started denied Abren advance request FORMS CARBON PAPERS AND ADDITIONAL LEGAL SUPPLIES AND OTHER LEGAL MATERIALS THAT ABREN WAS IN NEED FOR TO DO HIS LEGAL WORKS. Even Abren SHOULD TO THE DEFENDANTS SULLIVAN, MELCIO MILLER, AND ANY OTHER LAW LIBRARY OFFICER SUCH AS LL SUPERVISOR DEVITO. ANY COURT ORDERS OR COURT DEADLINES OR ANY STATUTES OF LIMITATIONS FOR ABREN FILE A COURT OF CLAIMS, OR ARTICLE 78. PETITIONS THEY DENIED ABREN THE LEGAL SUPPLIES AND LEGAL COPIER AND LEGAL SUPPLIES ALSO DUE TO THE DEFENDANTS ANNCCI, BROWN, HENWOOD, MELCIO MILLER, AND BELLINGER AND EASTMAN SEVERAL ABREN PENDING CASES PROCEEDINGS ACTIONS AND ITMOS WERE DISMISSED IN THE COURTS BECAUSE ABREN WAS UNABLE CO TO litigate such cases in the courts too

82) Abren was filed sick call daily reported chronic back pains, Right Hand Pains, Right Hand Carpal tunnel problems, Right Arm carpal tunnel problems, Left ankle, Foot problems, And Pains, Arthria problems, And MR Abren was also asked for his pain medications Neurontin a back brace, Hand brace, his orthopedic boots, physical therapy, the need of a surgery in his Right Arm, reported pain and bleeding in his Anus' rectal area the need of his Lipitor and claritin meds, And the need of his Photo Ray Visor / eye glasses but the medical nurses / Dernersons in Great Meadow CF such as Lipka, Havens, Rogue, La French, Brunelle, Von Order, Watkins, And Boices were Regulators Denied Abren sick-call services refused to address Abren medical complaints or pains bleeding and the need of his medical Doctor. And after Abren has review his medical records those nurses don't were reported many things in Abren records.

83) because Abren was filed sick call slip / request daily, the SHU Guards, C.O. And the Supervisors started to harass And threats to Abren with physical assaults, And they And the nurses to told And threatened Abren of slip or filed sick call slip or he never will see a Doctor, at Great Meadow CF Abren then he started to report the C.O. / supv. And nurses (Dernersons) misconducts harass, retaliations, threats And discriminations filed also grievance complaints And letters of complaint, to the facility Health service Director Kozandy to the nurse administration (Administrator) Ms. Morris to the Deputy Superintendent for Administration to Superintendent Miller And other Doctor authorities.

84) Abren also wrote multiple letter of complaints and sent it to the defendants KORNIGSMANN, ANNUNZI, BEILINER AND YAJER reported the nurses and guards/supervisors misconducts also Abren wrote to the chief of OSI/ Inspector general officer but the Defendants failed refuse and ignored in part Abren complaints or don't resolve the problems they acted of a form deliberate indifference to medical needs.

85) Abren receive a hand surgery in the year 2014 in March and a hand surgery for carpal tunnel in July 2015 and a colonoscopy also in the year 2015 when Abren arrive to Great Meadow of the right hand surgery was fresh his hand was in extreme or chronic pains in Green Haven of site doctors specialist and expert they to prescribed Abren multiple pain meds, a back brace a hand brace orthopedic medical books lotions Lipitor claritin of nasal sprays and recommendations for physical therapy because they found problems and also believed Abren complaints of pains and other problems of health including high cholesterol, hemorrhoidal bleeding problems problems in his stool. Abren get tuberculosis in the site because Defendants keep him behind plexiglasses for a long period of time so the ventilation and air don't circulates well inside of the cells. Abren have been in the site like 10 (ten) year consecutive and has been assaulted also several time by corrupt cos so his claims of pains and other medical complaints has merits so his daily complaints has also merits and a reason. The reasons are that he is in need of his medications, and medical devices in the site,

86) However the Defendants in Docs Albany in Wende CF in Sullivan CF And in Great Meadow CF appear don't understand all this or don't want to understand none of this because they are doing all this in Conspirancy And in Retaliations And in Discriminations And also intentioned for to frustrate, impede And interfere with Abren Plaintiff Actions And lawsuits against them in the western District court. And to the some time to assist to the N.Y.S Attorney General office, And Counsel's office.

87) The some nurses the some doctors (Defendants) in Wende Sullivan And Great Meadow or alleged Abren that all this care from Docs Albany Authorities who ordered to they don't prescribe or / And don't give Abren nothing so this is an open Conspirancy. Abren also suffer of a Gum / Mouth Gum Disease type infections the which was diagnosed in Green Haven CF in 2013 - 2014 And in Sullivan CF in 2015 where Dentist alleged And ordered that Abren need dental cleanings every 3 months for to control the disease And infections. However the Defendants in Great Meadow CF And the Defendants in Albany And in Wende they has ignored Abren complaints And also also with a deliberate indifference in the issues And problems. in Wende CF Abren never was allowed to see a dentist. And in Great Meadow CF after or five sick call slip daily Abren was allowed to see a dentist in April - May 2016 approx. between 6 to 7 months since October 2015 to April - May - 2016 so this is very clear the deliberate indifference from Defendants to Abren health, safety, core well-being welfare, And life in Great Meadow CF.

88) The Defendants Nurses And Site Staff eg C.O.s And Sgt.s started to write many false tickets manipulated fabricated And exaggerated in Retaliations for the numerous grievance And Complaints against them, Abren again placed in the special suit with a sign / flag up Exposed front his cell. He was moved to the last cell of the site (F-1-09 cell). The Site C.O.s were broken his toilet flooded his cell with feces And urines via / through the cell ventilator, via the toilet and under the toilet from the C.O. work behind Abren cell where are the connections with the toilet and sink this happened like four times or more from October 2015 to July / 2016. Abren never was allowed to clean his cell in such incidents not was provided neither any cell cleaning materials or items or articles. Abren was also denied for entire month of his Religious Kosher Foods / meals denied of his Religious Sabbath Foods and pass over food all intentionally in bad faith and in Retaliations for the Defendants Miller, Eastman, Thomas Peacock, S. Leonard, Plesco, Bascue, Meloic, Natbozny, Cleveland, Birrell, Cowry, Byers, Kellmon, Depalo and other staff. Also in great shadow of and supported and allowed / permitted by the Defendants in Albany

89) On 10/28/2015 Abren was advised by the Defendants Bascue And Lyons that he need to go mandatory to the MHU (Mental Health Unit) because the OMT clinician Mr. Ives Alleged that Abren need to go to the MHU observation cell. Abren was advised that he cannot go because to go to the MHU obs or use of force with a special team will be used against Abren for to force to him go to the MHU obs. cells.

90) Abren asked to the Defendants why he needs to go to the main obs cell if he don't have reported to no one that he proctesses or suicide or depressed or reported that he will kill himself to no one. However Mr Abren agreed to go to the main obs cell. He was escorted to the main obs cell by Sgt Lyons (main obs. cell supervisor). And two big C.O.s/guards Abren was placed in an inter-view room with the psychiatrist nurse Mr Pink. She acted like she don't know why Abren was sent to the main obs. However she was part of the conspiracy. Abren explained to her that he don't know why he was sending to the main obs. cell. She get out of the room. The Site Sgt (supervisor of the site) was already in the main obs. waiting for Abren so when Abren was in the room Sgt Barrie go inside ordered Abren get up and face the wall. He taken Abren for his neck and hit Abren forehead several time with the wall. And told Abren we will see if you are the top big dog that Doctor Albon say that you are. "we don't have video cameras records here".

91) Abren was escorted to other room (the main obs. area) where are the cells. There the handcuff were removed. And also was where present 5 guards/C.O.s one of them was the C.O. Gonza. And both Sgts Barrie & Lyons. They ordered Abren to remove all his clothes still he was completely naked. There they assaulted Abren physical and sexually they throw Abren to the floor kicked and punched him also taken him back to the front the wall hit his face and head against the wall. Hit both arms and legs. And the Sgt Barrie and a big C.O./guard Roped & sexually assaulted Abren front the wall.

92) The Defendants DASARE & IONS ORDERED
ABREN DON'T SAY NOTHING TO NO ONE ABOUT
THE ASSAULTS OR THEY WILL KILL TO HIM IN THE
MITH OBS CELLS BECAUSE THERE ARE NO ANY VIDEO
CAMERA RECORDS. & NO AUDIO RECORDS neither
ABREN WAS THEN PLACED IN THE LAST CELL OF THE
MITH OBS AFTER THE PHYSICAL AND SEXUAL ASSAULTS.
APPROX BETWEEN 10 TO 20 MINUTES AFTER THE
ASSAULTS THE DEFENDANTS MR IVER WAS FRONT
ABREN CELL ALONG WITH A C.O./GUARD. HE TOLD
ABREN NOW DO YOU UNDERSTAND? ABREN REPORTED
TO MR IVER ABOUT THE SEXUAL & PHYSICAL ASSAULTS
HE SHOWED TO MR IVER & TO THE CO. PRESENTER
ALL HIS INJURIES AND PAINS AREAS ABREN ALSO
SHOWED TO MR IVER THE BLOOD AND ASKED TO
THEY FOR MEDICAL ASSISTANCE AND HELP, MR
IVER JOKED LAUGHED AND 'SMILED' ALSO ABOUT
ALL THIS. AND THEY REFUSED TO ASSIST ABREN.
MR IVER THEN ASKED MANY PEOPLE BELIEVE THAT
YOU DESERVE ALL THIS 'BECAUSE YOU ARE IN PRISON
FOR ROB', LISTEN TO ME FUCKING ROBBER I
DONT WILL GO TO ASSIST OR HELP YOU, YOU ALSO
DESERVE ALL THIS. WELCOME TO GREAT MEADOW."
THEN MR IVER LEFT ALONG WITH THE C.O. LAUGHED BOTH.

93) ON OCTOBER 129/2015 EARLY IN THE MORNING
THE SUPERINTENDENT MILLER AND THE DUE MR
EASTMAN WERE MAKING ROUNDS IN THE SITE AND
ABREN STOPPED TO THEM FRONT THE CELL. THEY
OBSERVED ABREN LACERATIONS SWOLLEN FACES
ONE CLOSED EYE / BLOOD SHOT EYE CUTS OVER
ALL HIS BODY AND FACE, ALSO OF BRUISES OVER
ALL HIS BODY & FACE - ABREN ALSO SHOWED TO THEM
BLOOD ON TOILET PAPERS COMING FROM HIS STOOL
AND ABREN REPORTED TO THEM THE SEXUAL AND
PHYSICAL ASSAULTS BUT THEY ONLY TOLD ABREN THAT
HE IS A 'SCUMBAG' AND OTHER DIRTY WORDS AND IGNORED
ABREN AND THEY CONTINUED WORKING AND LEFT THE UNIT.

94) Abren reported onto the incident to the psychiatric nurse called ms K And to the nurse Havens (medical nurse defendant ms Sherry Havens) but she refused to report the sexual and physical assaults all or many of Abren injuries. And don't allow Abren see a doctor And gave Abren only two (2) Tylenol And left the area alleged that she have other things more important to do. ms K she report the incident to the unit chief MR Jackson And to the OMH team And psychiatrist MR Pal MR Jackson communicate the incident to medical watch command the supervisor miller DSI Eastman And FHSD MR Karonda L nurse administrator ms. Horrit but still Abren was denied all classes or medical care admissions examinations and treatments even MR Jackson RN K DR Pal And a social worker have observed the injuries on Abren body of feeling or chronic pains.

95) The defendant MR Pal recommended Abren don't say nothing, keep his mouth quiet And so he will avoid most problems. All will tell you don't know who I am. I don't will go to keep my mouth quiet I will go to report all this to the United New York State And United States if possible I AM against **ABUSES** mistreatments & coverups. Then the DR Pal sent back to MR Abren to the SHU alleged that in the SHU he will be more secure, And safe that in the main obs. because the SHU has video camera records. Abren was then escorted back to the SHU in noon or afternoon time by a female sgt & two c-ors. The sgt Bascue when he saw Abren he smiled and asked "now do you feel better? Ha Ha Ha

96) On October / 30 / 2015 The defendant MJ BOAIL, an Inspector General investigator (OSI INV.) came to the site at Great Meadow from Docs Albany to interview Abren about ONLY THE INCIDENT OF SEXUAL ASSAULT. She alleged that she don't care about the beaten up physical assaults OR the injuries Bruise, OR Pains in Abren body. Abren explained to the Boail all the incident, but she denied Abren medical care. Denied Abren to see a Doctor to get examinations. Denied to send Abren to an outside hospital. Denied Abren to get preventive care, Denied Abren a HIV test. Denied Abren a transfer or an emergency transfer. Denied Abren to be placed under Hand video cameras, Denied And Refused to take photos / Pictures of Abren injuries. Refused to provide or give protections to Abren. She ONLY alleged that other OSI investigator will to investigate the physical assaults but not she (However that other OSI INV. never have yet come to interview or investigate the physical assaults). She also try to manipulate Abren And try to converse to Abren to sign a paper like nothing has happened that day, the which Abren refuse to do so explained to she that he won't do continue with his complaint. Happen, what happen.

97) She alleged also Abren that Docs authorities has directed to they (Inspector General Office) don't do nothing for Abren. Don't send him to an outside hospital when he is physical and sexually assaulted by staff in any prison also, she alleged that they has Abren name on a wall in big size on a board, that every one know who Abren is in Albany, and that they has a big table & boxes of Abren mainly complaints.

98) Abren was placed in a special cell one in November/2015 after the injuries has not disappeared or healed. Abren was escorted to the facility infirmary and examined by DR KORONDI AND DR POOLANO who denied Abren all classes of pain medications and advised Abren that he will not receive nothing in all in Great Meadow CF. That the care from Doctors Albany Authorities they asked Abren what classes of lawsuits do you have against the Department / Doctor / ? They told us that we cannot give you nothing because you have a lawsuit pending against the Department about an incident happened to you in Five Points Correctional Facility. Abren explained to them what classes of lawsuits he has because Abren don't have nothing to do cover up about his pending lawsuits in the Western District Court AND Any other courts. Also the DR KORONDI AND POOLANO, alleged that they had abren to an outside hospital for any kind of examinations because 72 hours has already passed AND by Doctor policy an inmate can be sending to an outside hospital only within of 72 hours of the service around.

99) Abren was going back to his cell without any kind of pain med AND medical treatments. The defendant MR THOMS HE IS ALSO A DEFENDANT in the Plaintiff lawsuits in Western District Court in former AND CONVICTED cases in Five Points CF Site. Now he is working in Great Meadow CF such as the first Deputy Superintendent / The second Superintendent HE REMEMBERS Abren AND HE HAS THREATENED Abren several time. He also is doing the same things that HE was doing in Five Points against Abren cover up 17000 misconducts AND denied Abren all classes of medical care.

100) The Defendants in Great Meadow Cr
Has Placed Abreu in Various RESTRICTED
DIETS/LOAFS since November 2015 TO July
2016, FOR Seven Months Abreu was Kept
IN RESTRICTED DIETS. THE DIETS WERE INA-
-DEGRADED WITH LACK OF NUTRITION, THE
LOAFS NEVER WERE FRESH IT DONT' WERE
ONE POUND THE LOAFS WERE ALWAYS HARD.
VEGETABLES IF ANY WERE NOT FRESH NEITHER.
THE MEDICAL NURSES WERE FORCED TO MONITOR
ABREU REFUSED MANY TIME TO TAKE ABREU
BLOOD PRESSURE AND WEIGHT FORCED RECORDS
REPORTED FALSE STATEMENTS IN ABREU RECORDS
COMPLETELY MANIPULATED ABREU WAS ALSO UN
WEIGHT HE REPORT ALOT OF TIME TO THAT OF
TO ALL THE OTHER DEFENDANTS IN GREAT MEADOW
AND DOCTOR ALBONI, THAT THE LOAFS PROVOKED
STOMACH PAINS CONSTIPATION, HEARTBURN
BLEEDING VOMITS AND NAUSEA. BUT IN MOST
OCCASIONS THEY IGNORED ABREU OR IN A FORM
DISLIBERATE AND INDIFERENT AND REAGED ALSO
TO STOP THE LOAFS, & PROVIDE ABREU TREATMENTS.

101) The loafs sentences were on open CONSP-
-RACY AGAINST ABREU BETWEEN THE DEFENDANTS
MR EVER MILLER JACKSON, POL EASTMAN, DR
KARANDY, SGT BASCUE, NABOZNI, CLEVELAND DEPS
ANNUGGI, AND BRINIER AND VENETTOZZI. BECAUSE
ABREU ARRIVED TO GREAT MEADOW CR SINCE SUCH
AS A LEVEL 1 DESIGNER BY OMH. WHILE ABREU
IS A MIT LEVEL 1 THE DEFENDANTS CANNOT TO
IMPOSE THE LOAFS AGAINST ABREU. ALSO THERE
IS A PRIVATE SETTLEMENT BETWEEN DAI AND
OMH AND DOCS CALLED DAI V. OMH/DOCS
CASE NO. 1:02-cv-04662 SDNY. 3007. THIS PRIVATE SET-
-TLEMENT ALSO TO PROTECT PRISONERS BY DESIGNER SUCH
AS LEVEL 1. SO, THE DEFENDANTS IN CONSPIRACY & APPROPRIATE
SENTENCED ABREU TO MURKINLY SENTENCE OF LOAFS IN BAD FAITH.

102) Abren had several interviews with the Defendants Ives, Pal and Jackson asked to they why he is placed to restricted diet if he is not supposed to be sentenced to looks because the looks don't apply him by DOCS Directive 4933 4932 and private settlement in OAE v. OMH / DOCS. The Defendants admitted to Abren that he is 100% right that he is not supposed to be placed on/ and sentenced to looks but alleged that Great Meadow C.F. regularly they don't care what the courts or judges say that they always doing whatever they want that they regularly don't follow it own policies, directives and regulations and laws. Abren then wrote multiple grievances and letters of complaints to DOCS in Albany to defendants Annucci, Bellmer, Heywood, Bellomy, Venetozzi, Brown, Koenigsmann, McCoy, Holloman, Eaffian and Hilton. However this Defendants regularly ignored Abren, ignored his complaints, also refused to resolve the problem acted on a form deliberate and indifferent trying to cover up Great Meadow C.F. Defendants against Abren this Defendants also cornered or multiply violations of Abren constitutional rights and civil rights but they in retaliation in discrimination and intentionally in bad faith approved also the looks, for Harry Abren physical and psychological placed Abren health & safety in an imminent danger.

103) Abren also appealed all and each of the sentences of looks Abren wrote multiple letters of complaints also to the Defendants Miller, Morris, Eastman, Melacio, Peacock, Horrit, Korondi, Natarelli, DePalo, Collins and Cleveland about the looks but they also affirmed the sentences of looks they know that the looks was inappropriate no adequate no nutritive, & was/were putting sick, and lossed weight

104) Abren also spoke many time with such defendants above in their rounds in the SHU and reported to them about the looks however in retaliations and in bad faith for try to avoid a lawsuit they ordered to OMC staff / defendants MR Ives MS PAL and MR Jackson to change Abren mental health from level 1 to levels 2, and 3 so in that way they can to avoid such claims and place to Abren under multiple sentences or locks in bad faith so in that way he can be harmed and suffer in form of tortures

105) Great Meadow of administration and OMC administration to meet each other every 15 to 30 days for to talk about the prisoners the prisoners ICP prisoners ect. in the meetings there are the medical and mental health doctors social workers nurses, superintendents Deputy security staff ect. so they planned all this against MR Abren DR PAL told Abren many time, that they has reported to that that about Abren physical and mental health about the need of his medical and mental health medications about the CPN shield the looks, lock or cell cleaning, staff and nurses misconduct against him about the false tickets about Abren harsh conditions or confinement ect. but she alleged that they always told to they that they don't care about MR Abren that he need to suffer that he need to be tortured or punished, that they don't care if he die or not die, that they has the hope that he kill him own self, hanged up. she say Abren that she surprised of the hate that they has against Abren and the circle of conspiracy that they has against Abren

106) IN FACT, ABREN MH LEVEL WAS CHANGED TO LEVEL 3 BETWEEN JANUARY TO FEBRUARY 2016. IN THAT TIME THE DEFENDANTS MILLER EASTMAN THOMAS, ANNUNZI, BRUNNER AND VENTROCELL ORDERED AND APPROVED TO THE HEARING OFFICERS ONLY SENTENCE TO ABREN TO MULTIPLE SENTENCES OF BOOKS (RESTRICTED DISTS) AND GAVE GREEN LIGHT TO THE NURSES AND GUARDS AND SUPERVISORS TO WRITE MULTIPLE FAIRLESS TICKETS AGAINST ABREN, SO, HE WILL BE SENTENCED TO BOOKS FOR A LONG PERIOD OF TIME SO, ABREN WAS SENTENCED TO MULTIPLE SENTENCE OF BOOKS FOR SIX TO SEVEN MONTHS STRAIGHT FOR EACH TICKET REPORT AND ORDERED TO THE MEDICAL NURSES DON'T GIVE ABREN NOTHING. DON'T STOP THE BOOKS NO MATTER HOW SICK OR FEELING OR SICK HE REPORT NO MATTER HOW MUCH OR HOW MANY POUNDS HE BOOKS. NO MATTER IF HE EAT OR NOT OR IF THE BOOK NO MATTER HIS SYMPTOMS. SO, ALL WAS PLANNED BY DEFENDANTS.

107) ABREN WROTE MULTIPLE LETTERS OF COMPLAINTS ALSO TO THE DEFENDANTS OF OMH AND OMH COMMISSIONER SULLIVAN, CENTRAL NEW YORK PSYCHIATRIC CENTER MCCULLAGH EXECUTIVE DIRECTOR TO RISK MANAGEMENT'S STAFF HENNING, BERNSTEIN, GRONTE, WHO ARE IN CHARGE OF THE SATELLITE UNIT OF MENTAL HEALTH INSIDE/WITHIN OR THE DOCS CORRECTIONAL FACILITIES. THE CNYPC AND OMH ARE THE MAIN OFFICE AND CENTRAL OFFICE OF ALL THE SATELLITE UNIT OF OMH STATE WIDE INSIDE OF DOCS PRISONS. SO ABREN AND OTHER WATCH DOG ORGANIZATIONS AND LEGAL ORGANIZATIONS AND LAWYERS, ALSO REPORTED TO THEM (THE OMH/CNYPC & DOCS DELEGATES) THE MISCONDUCTS ABREN AND HORROR CONDITIONS OR CONFINEMENTS THAT ABREN WAS SUFFERING IN THE HANDS OF GREAT MEADOW OR ADMINISTRATION / STAFF

108) in January 2016 Defendant Lipka was denied sick call services Abreu Jr was reported his medical complaints or / and not provided Abreu ANY OTC MEDS such as Tylenol ASPIRINS IBUPROFEN OR MEDICIN D. Anti-Acids treatments for hemorrhoids RCT OTC MEDS DON'T NEED ANY DOCTOR APPROVE, OR PRESCRIPTIONS SO when NURSES DENIAL OTC MEDS THIS IS INFER OR HIT OR THEIR OWN CHOICE AND MISCONDUCTS AND IN THEIR OWN DELIBERATE INDIFFERENCE Abreu WROTE MULTIPLEX GRIEVANCE COMPLAINTS' AGAINST RN LIPKA AND WROTE ALSO MULTIPLEX LETTER OF COMPLAINTS AGAINST RN LIPKA AND OTHER NURSE (DEFENDANTS) FOR FEBRUARY / 2016 RN LIPKA STORED gave Abreu ONLY ONE PACKET (2 TABLETS) OF IBUPROFEN OR TYLENOL THAT IT SHE DIRECTED & ORDERED TO THE OTHER NURSES TO STOP TO PROVIDE OR GIVING Abreu OR DELIVERED Abreu 3 OR 4 PACKETS OF TYLENOL IBUPROFEN MED D OR ANTI ACIDS, OR BECAUSE THIS LOOKS TO SHE 'BAD OR INDIFFERENT TO Abreu MEDICAL COMPLAINTS about his CHRONIC PAINS.

109) The other nurses were coming and saying Abreu That RN Lipka, she don't want to They gave Abreu MORE OF ONE PACKETS OF OTC MEDS. Abreu WROTE MULTIPLEX GRIEVANCES & COMPLAINTS' AGAINST RN LIPKA THEN RN LIPKA IN RETALIATIONS she started also to write MULTIPLEX TICKETS & REPORTS AGAINST Abreu also with the other guards SUPPORTED & COVERED UP BY DEFENDANTS BOSCH LOWRY Cleveland, WILLIAMS, NOBOZNY, De Poles, Peacock, THOMS, EASTMAN, MILLER, HARRIS, KORNBLAU, COLLINS, KORNIGMAN, ANNUNCI, MELCIO, BELLAR, BELLAMY, SGT BEEBE, BIRRELL, & HARRING OFFICERS, even video tapes showed that Abreu not was getting, they found Abreu guilty of all.

110) Abren continue reported Lipka misconduct - SICKS AND RETALIATIONS AGAINST HIM. Then the medical nurses such as the Defendants Havens, Roger, La French, Von Order, Watkins, Boice, Brunoice started little to little - for the months of March / April 2016 TO Denied Abren all classes of OTC meds. They were continue coming front Abren cell (some time they came & some time they don't come front Abren cell) but don't were bring any OTC meds to Abren in all. ONLY RN Lipka was bringing OTC meds to Abren when she want to do so. The reasons was a plan AND CONSPIRACY between the nurses the Nurse Administrator Havens DR Korondi AND DR Poolono. For that all looks that RN Lipka was provided Abren medical care so to cover up her misconduct against Abren to the some time so all was a TRICK, for that the grievances AND COMPLAINTS that Abren was filing against RN Lipka OR / AND THE OTHER MEDICAL STAFF appear like without merits OR unfounded claims. The some things with THE WEIGHT AND BLOOD PRESSURE DURING THE looks sentences RN Lipka was the unique doing it. THE OTHER NURSES WERE FORCE TO DO SO AND THE SAME WITH THE SICK CALL SERVICE.

111) in The Begon / beginning of May / 2016 (Abren believe between May / 10 - 16 / 2016) RN Lipka came front Abren cell TO TAKE BLOOD PRESSURE AND / OR weight because Abren was placed in look sentence the COS Short, Weston AND Dickinson were escorted to she. Once time Abren was out of his cell RN Lipka started TO THREATENED Abren, yelling & screaming abren saying TO him, you wrote me OTHER grievance Complaint now, you don't will go TO RECEIVE NO OTC meds in all. no NURSES will go COME front your cell NO MORE DURING THE now you don't will go get SHIT in all NO MORE, DO YOU !

112) The Defendants Lipka also added, oh And listen me I will go to make sure that you never get no more pain meds in all stop of putting & fixed sick call slips you don't will get your meds back that you was received in other prisons/Six, you don't will go get here nothing in all. The Cos Short, Weston and Dickinson told to PW Lipka to stop and be quiet. So, she stop Abren was placed back to his cell and they left the area, she denied sick call Abren too.

113) AFTER THAT THREATS AND INCIDENT, THE NURSES/Defendants Roger, Correch Brunelle, Van ORDER, WATKIN, Havers, AND Boice DENIED Abren all classes of SICK-CALL SERVICES ALL CLASSES OF ANY MEDS. AND NEVER AGAIN TOOK Abren weight OR BLOOD PRESSURE. THEY ARE DENIED Abren openly all classes OF SICK CALL SERVICES SINCE THE MONTH OF MAY / 2016 TO THE PRESENT JUNE / 2016. Abren DON'T HAVE IN THIS TIME ANY KIND OF ACCESS TO MEDICAL CARE. Abren HAVE REPORTED IN HIS SICK CALL SLIP/REQUEST ASTHMA PROBLEMS: CHEST PAINS, RESPIRATORY PROBLEMS, CHRONIC BACK PAINS, HOND / RIGHT HOND & RIGHT ARM PAINS, POTHAS PAINS THROAT & ~~EAR~~ PAINS DUE TO INFECTIONS, PAIN IN HIS NECK DUE TO THE PADLOCK OR THE SPECIAL SUIT & CELL TO TINY / SMALL THE NEED OF HIS BACK SUPPORT HOND SUPPORT ORTHOPEDIC BOARD HIS EYE GLASSES / DARK / TINTED LENSES: NEED FOR PHYSICAL THERAPY, DENTAL CLEANING EVERY 90 DAYS DUE TO MOUTH GUM DISEASE THE NEED OF HIS T-B. MEDS, STRONG HEADACHES (MIGRAINES) HEMORRHOIDAL BLEEDING / PAINS ANUS RECTAL SKIN DRYING, NEED LOTIONS OR CREAMS NEED A OR ARM INJURY BUT NURSES HAS IGNORED Abren, THE DOCTORS REFUSED SEE HIM, AND NURSES ARE NOT REPORTED HIS COMPLAINTS.

114) Abren believe that the Defendants nurses are throw away all his sick call slips/ request or part of them and no reported many of Abren complaints in the sick call slips, in LIPKA she stopped also to bring or provide Abren any classes or OTC meds, also in retaliations, for Abren grievances and complaints against she

115) The Defendants DR. POOLONI AND DR. KARONDI has longer months refused to see Abren since the month of March OR APRIL 2016 TO THE PRESENT JUNE 2016 they have refused to see & Exam Abren. All 8 each time Abren has saw to DR. POOLONI HE ALWAYS IS DISRESPECT Abren, called Abren a PERVERT every time he saw Abren wearing the special control suit, referred to him to MR. ABREN refused to address & resolve any medical complaints refused to address Abren medical needs refused to prescribe Abren PAIN MEDS and others treatments for Abren TB /tuberculosis AND HEMORROIDAL / bleeding he never has examined abren rectal / rectum STOOL Abren SKINS, never has take any test of ASTHMA NEVER has touched Abren body never has examined Abren right hand, on arm back neck OR / AND LEFT ANKLE / FOOT neither he ONLY keeping saying Abren your MEDICAL RECORDS Continue under review. ONE OTHER DAY you never will go get back from me your PAIN MEDS: ORTHOPEDIC BOOTS Hand brace OR back SUPPORT. HE USE DIRTY WORDS & DISCRIMINATORY WORDS AGAINST Abren HE DONT ALLOW Abren TO TALK, AND ONLY HE SAW Abren FOR few MINUTES AND SENT Abren back to the side of other DR. HE alleged that DOCS ALBANY of society ODMHIS - TRATION ORDERED him don't give Abren nothing in all.

116) Abreu, Lipitor AND claritin med. were the only med. that were again re-prescribed back in the month of March or April 2016 after Abreu wrote multiple letters of complaints and grievances. And between March or April 2016 Abreu was allowed to see the DR ARUJS in a medical visit to Sullivan CF because DR ARUJS was who conducted 'Abreu Hand surgery' in the month of July / 2015. MR ARUJS told Abreu, that the hand don't have healing yet, that still it look pink color that he need physical therapy & hand brace and pain med. MR Abreu explained all the limitations that he has with his hand the pains, the problems for write for to do different activities the problems in holding a write pen with his right hand Abreu told & explained to DR ARUJS that the only way Abreu can write is ripped a t-shirt like a bandage and applied it very tight to his hand, and placed the pen in a different positions after that he is completely unable can to write in the normal way.

117) However even and the DR ARUJS prescribed and recommend pain med. or hand brace and physical therapy the DR Poolson, DR Koenigsmann, Supt Miller, Mr. Thomas, Ms. Peacock, the Defendants in Docu's Albany Central office, DR Koenigsmann. They refused to follows the DR ARUJS (Hand specialist / orthopedist) orders prescriptions and recommendations the DR Poolson, told Abreu that he called back to DR ARUJS and make sure that he changes the prescriptions and recommendations because he give make sure Abreu don't get nothing also Abreu was denied copies of the medical records.

118) when Abren was sexually & physically assaulted in the month of October/2015 the Defendants Boice von order Harten and Watkins and Rogue refused and intentionally report Abren complaints pains assault and injuries of the sexual and physical assault even Abren filed sick call daily in the following days after the assault and even Abren showing to they the injuries over all hit body and face and the facility administrator refused to take photos / pictures of Abren serious injuries trying to cover up the assault and nurses cover up and miscon-
ducts and nurses don't reported in Abren medical records the injuries or what he also reported to they in the sick call slips of verbiage all on open conspiracy, Retaliations and open discriminations against Abren

119) The Defendants Sgt. Breege Kuinlan Bellomy Hale, Miller, Melocio, Thors Eastmon, Annuci, Hilton and Hickox and Heywood has also on open conspiracy with Abren Grievance Complaints and Grievance Appeals. They has placed Abren in limited filing of grievances and appeals. regularly they only process one or two grievances in the weeks the rest they missing it or throw way it or not process it they pick up what grievance complaints they will go to accept or file or process and which grievance or appeals they will to process. AND not to process, they every each weeks missing not process not file. neither many of Abren grievances & Appeals that he sent to the IGP office along with copies to Doctor central office (the Defendants above) and copies to Supt Miller Melocio Eastmon (Great Meadow Defendants, but they sent none or no copies back to Abren

120) The Directors Miller, Deeb, Kulinaw, Melega, Effron, Thoms, Eastman, Collins, Koenigsmann, Peacock, Holman, Bellomy, Morris, Hale, Heywood, Chief of OSI, Hiron, Monitor, Anacca, Brown, Hickox, Jackson, Docs/OMH/PLS, Has showed an open deliberate indifference to Abren grievances and complaints and appears they through of it grievances/complaints, and Appeals, has learned of all and facts violations that Abren has suffered at Great Meadow Cf/Site, has learned of the Constitutional Rights violations of the Civil Rights Human Rights and of the violations of its own Docs/OMH Policies River Regulations Directives norms and state and federal laws. So they don't have any excuses, they have just returned back to Abren all appears that Abren has senting to they Appeals to the next level eg. Superintendent and CORC under the state regulations but they alleged that they only follow Docs Directive # 4040. of Correction law § 129 not the grievance regulations under Title 7 NYRR and title 9 NYRR and that Docs Directive # 4040 don't allow Abren to appeal to the next level in his own of it don't allowed Abren to send copies of his grievances and appeals to the Docs Central Office directly to them. However every Abren sending it directly to the IGRC/IGP Clerks, IGP Supervisors, IGRC/IGP Sgt/Bridge they don't process it, nor the supervisor neither.

121) Additionally the IGP supervisor Ms. Kulinaw she has failed to take rounds in the site, refused to put or place a secured locked box for the grievances complaints in the site, and she don't respond neither to letters.

122) MR Abren letters And grievances
ARE REGULARLY MISSING, THE DEFENDANTS REGU-
-LARLY ALLEGED AND I informed that they
DON'T HAVE RECEIVED ABREN GRIEVANCES
OR LETTERS. THE COURTS AND JUDGES
WOLFORD ALLEGED THAT SHE OR HER CLERIC
DON'T HAVE RECEIVED SEVERAL LETTERS OR
MR ABREN. SO THIS IS VERY (CLEAR). THE
SHE SUPERVISORS, GUARDS & STAFF, ARE
SUSPENDED AND PLAYING GAMES WITH ABREN
OUTGOING CORRESPONDENCE /MAILS AND INSIDE
MAILS SO A LOCKED SECURED MAIL BOX IS
COMPLETELY NECESSARIES, IN GREAT MEADOW OR
ALL AND EACH OF OTHER DOCS PRISONS (STATE
WIDE) SUCH SUCH FIVE POINTS OF, CLINTON
CF STATE, WENDE CF SITE, GREEN HEAVEN OR
SITE, SING-SING OR UPSTATE OF SITE,
SULLIVAN CF, WANA, ALL THE S-BLOCK AND
SOUTHPORT OF D-BLOCK EITIMA CF SITE
EASTERN CF SITE, ATTICA CF SITE, AUBURN
CF SITE, HAS A MAIL BOX OR GRIEVANCE BOX
SECURED WITH A LOCK WHO ONLY THE CORRE-
-SPONDENCE UNIT GRIEVANCE SUPERVISOR AND
SITE SUPERVISOR HAS THE KEYS OF IT BOXES
BUT GREAT MEADOW CF SITE DONT HAS AND
SECURED MAIL OR/AND GRIEVANCE BOXES LOCKED WITH
A LOCK OR PADLOCK. INMATES AND ABREN
ARE FORCED TO PUT HIS OR THEIR THEIR MAILS
LETTERS/CORRESPONDENCE DIRECTLY ON THE CELL BARS
WHERE THE C.O'S PICK UP IT IN THE MORNING. SO THE
HAS DIRECTLY CONTACT WITH OUR MAILS WITHOUT ANY
SUPERVISIONS, AND WITHOUT ANY PUNISH TO THEM MISCONDUCTS

123) MANY PRISONERS IN GREAT MEADOW OR
SITE FOR YEARS HAS REPORTED THE MISSING OF THEM
LETTERS OR GRIEVANCES, BUT THE DEFENDANTS HAS COVERED
ALL THIS AND IGNORED THIS CLAIMS OF COMPLAINTS. SO THIS IS
VERY EASY FOR THE SITE C.O'S/STAFF TO THROW OF MISSING MAIL

124) Abren had a video conference with the Hon. Elizabeth A. Winkler in the month of December 2015 and January 2016 along with the N.Y.S. attorney general office and the assigned pro bono counsel for the case Abren v. Farver et al. 11-cv-6251. Abren explained to the court the problems in he received legal supplies legal papers and mail also Abren explained the problems he having with the defendants and the problems in having access to his legal materials where the defendants has denied Abren his 22 bogs of legal materials when Winkler and Sullivan allowed Abren receive one having in his cell 22 bogs of legal materials and Sullivan allowed five bogs of legal materials Abren also reported to the court that others the prisoners how listen Abren stopped many time to the defendants in their rounds in Great Meadow cell site and complained the misconduct of Stock Guard about legal supplies carbon papers of law library Defendants misconducts also Abren asked to them for access to his legal materials but that the defendants ignored Abren complaints/requests

125) Since December 2015 / January 2016 to the present July 2016, nothing has changed the defendants continue with their open misconducts open retaliations open discrimination issues open abuses open white supremacy issues open deliberate indifference to Abren rights laws and constitutional rights open abuses of power and authorities open corruptions open conspiracy, and openly trying to harm Abren with unusual and cruel punishments, and other open many misconducts/abuses

126) The Defendants also required to wash the special control suit every time Abreu walk to the shower the suit is in in the floor it never has been washed & where it is placed is where prisoners are strip searched inside of the strip room. When they come to the site so every one stand there so the suit it is keeps on the floor in that area. after Abreu is forced to wear it suits all it is filthy and anti unhygienic acts; the Defendants then doing all this intentionally for Horns and humiliates Abreu. Abreu it has now rash and a lot of itches, and problems in his skin worsing it filthy suits, remains unwashed. And striped like shirt they never has sent it suit to the laundry. to the present of it lawsuit Abreu continue be forced to wear it suits continue unable can to clean his cell, toilet sink floor ventilation (the ventilation it don't work in all). The cell shields/plexiglasses continue front Abreu cell no hot water no bucket and also deprived of headphones of the cell is too hot "Abreu, security, safety, well-being, life care, health, and welfare are in an imminent and serious danger of deprived of all access to health care"

127) The Defendants Barcelo; Deininger; Venetucci; Annucci; Bollony Hale; Heywood; Horris; Tuer; P.A.C Jackson; Paolono; Karandj; Fisco; Thom's; Brén; Nabor; Despico; Gonyeo; Weller; Melicio; Easton; Cleveland; Kingsron; Beebe; Collins; Williams; Birrell; Sconlon; Vladyska; Loury; Byars; Leonard; Kellman; Peacock; Boles; McKoy; Lipka; Royal; LaFresch; PINK; LeClaire; Von Order; Watkins; Sullivan; Brunelle; Hollins; Hilton & Chief of all; Has all of each of they knowledge about all that violations, abuses, tortures, discriminations, restraints, & harassments against

128) THE DEFENDANTS MAYER - EASTMAN, ANNUNZIATO, BONIN, HICKORY, MELCIO, THOMAS, WILMINGTON, SCONCINI, VLADYKA, LOWRIE, BYERS, KELLOGG, COLLINS, CLEVELAND, DEPAOLO, LYON'S, MAGONE, BASCUL, PEACOCK, VENETTI, HILTON, DELONG, HALE, HERWOOD, BRUNI, BEEBE AND DOCS - DENIED ABREN HIS PASS-OVER MEALS. THEY DIDN'T ALLOW ABREN INVENTORIALLY IN FOOD FAIRY; IN RETALIATION AND DISCRIMINATION, TO PARTICIPATE IN THE JEWISH PASS-OVER. ADVISED THAT ABREN HAS SENTENCES OF RESTRICTED DATES IN MAY/2016, WHEN THE PASS-OVER STOPPED. HOWEVER, THE DOCS DIRECTIVE # 4933 SAYS SECTION 304 2 1b, CORCORAN STATED THE FOLLOWING BELOW:

"A PRE-hearing Restricted Diet OR RESTRICTED DIRT DISCIPLINARY SANCTION SHALL BE SUSPENDED DURING THE PASS-OVER HOLIDAYS FOR AN INMATE WHO IS DESIGNATED AS JEWISH IN ACCORDANCE WITH DIRECTIVE # 4200 'RELIGIOUS PROGRAMS AND PRACTICES'."

129) ABREN SHOW THE DIRECTIVE 4932 & 4202 TO ALL AND TALK THE GREAT MEADOWS OF DEFENDANTS ABOVE. IN THEM SHU ROUND ABREN WROTE SEVERAL LETTERS AND COMPLAINTS TO THE DEFENDANTS IN GREAT MEADOWS OF AND TO ALL AND TALK OF THE DEFENDANTS ABOVE FROM DOCS CORNELL OFFICE. HOWEVER THEY REFUSED TO ALLOW FOR ABREN TO PARTICIPATE IN THE PASS-OVER BECAUSE TO RESOLVE THE PROBLEMS, IGNORED ABREN - COMPLAINTS AND RIGHTS ACTED OR A FORM DELIBERATE AND INDIFERENT TO ABREN RIGHTS RELIGIOUS BELIEF RELIGIOUS PRACTICES, & IGNORED THE DOCS DIRECTIVES ABREN FIRST AMENDMENT RIGHTS OR GRIEVANCE COMPLAINTS' DUE PROCESS OF FEDERAL LAWS/REGULATIONS ABOUT RELIGION'S, SUCH AS THE RFRA & RLUIPA.

130) The DOCS AND THE DEFENDANTS IN CENTRAL OFFICE AND GREAT MEADOWS HAS CHANGED THE CAD KOSHER MEALS/FOODS FOR REGULAR MEALS/REGULAR FOODS THAT ARE NOT KOSHER AND THAT VIOLATE THE JEWISH LAWS JEWISH INSTITUTIONAL LAW ABOUT KOSHER MEALS/FOODS. THE DEFENDANTS INTENTIONALLY AND IN BAD FAITH HAS CHANGED THE KOSHER MEALS/FOODS AS NO JEWISH FOODS/MEALS ONLY BECAUSE THEY ARE ANGRY AND OF VAST THAT ALSO OF PRISONERS IN THE SITE HAS CHANGED THEIR RELIGION TO JEWISH RELIGION THE WHICH THEY ALLEGED THAT THEY BELIEVE THAT IT IS ONLY FOR THE FOODS AND ALLEGED THAT THEY ARE SPENDING TOO MUCH MONEY IN CAD KOSHER MEALS. SO THE PLAN OF THEY WAS VIOLATE PRISONERS' JEWISH RIGHTS OF DEFENDERS, FOR TO FORCE TO THEM TO GET OUT OF CAD KOSHER MEALS OR KOSHER MEALS AND GO BACK TO REGULAR FOODS SO THEY IN BAD FAITH ARE PROVIDED ABREN NOW BAD FOODS THE WHICH CLEARLY IT IS NOT KOSHER MEALS. THEY STARTED ALL THIS NOW IN THE MONTH OF JULY/16

131) IN GREEN HAVEN CF/SITE FOR EXAMPLE THEY ALLOW TO JEWISH PRISONERS, AND THOSE WHO ARE DESIGNED SUCH AS JEWISH IN THEIR RELIGION TO PICK UP BETWEEN CAD OR HOT KOSHER MEALS/MEALS. BECAUSE GREEN HAVEN CF/SITE HAVE BOTH 'KOSHER MEALS CAD KOSHER AND HOT KOSHER MEALS. IN GREAT MEADOW CF JEWISH CASES, SUCH AS ABREN CASE, THEY FORCE HIM TO PICK UP ONLY THE NEW REGULAR FOODS THE WHICH THEY CALL HOT KOSHER MEALS, THE WHICH IT IS VERY DIFFERENT TO THE HOT KOSHER MEALS IN GREAT MEADOWS DONT GIVE ABREN ANY OTHER CHOICE OR KEEP IN CAD. SO THE DEFENDANTS HAS VIOLATED ABREN RIGHTS.

132) The Defendants Pal Ives And Jackson Has An Open Deliberate, Indifference To Abren Safety, well being core, Health Welfare / security They Has Twice Discontinued All Psychiatric Meds. For Stress Distress Depression lack of sleep float back ~~and~~ lack of concentrations Due And To The Physical And Sexual Abraids And Defendants Multiply Misconduct Against Abren And The Horsey Conditions. Circle of unusual Confinements And Punishments in The State. (S) They Discontinued Abren Psychiatric Meds in April / 2016 in Retaliations because They Alleged That Abren Has Exposed himself To A Mental Health Nurse after That Abren Filed multiply Letter of Complaints inside And Out Of Prison, Legal Organizations CNYPC, DOCCJ / OMH / ect, The Defendants Above Restored Abren Psychiatric Meds. in May / 2016 Re Prescribed It back. Then in June / 2016 They Against Abren in Retaliations Again To Discontinue All His Psychiatric Meds, without Any Explanations, advice, notice, notifications.

133) Abren Wrote Several Complaints Against The Defendants Above And Asked Why Abren Meds. Were Discontinued The Defendants Pal Ives, And Jackson, Told Abren That They Continue His Medications in Retaliations because A Mental Health Nurse / Psychiatric Nurse Alleged That Abren Sent To She An INAPPROPRIATE LETTER This Nurse Was The Defendant Ms. Leclaire. When Abren Make Complaints That This Are not Reasons For To Discontinue His Medications Then The Defendants Used To The Nurse Ms. Pink Alleged That The Observed Abren not take his Meds Spitting It Inside Of A Cup, And Other Mr. Ives Also Wrote A False Statement Alleged That Abren Don't Goin His Meds.

134) THIS IS AN OPEN CONSPIRACY, AND COVER UP AGAINST ABREN, FIRST ALLEGED LEWD CONDUCT SECOND ALLEGED A LETTER TO A NURSE AND THIRD ALLEGED THAT THE NURSE OBSERVED ABREN SPIT IT OUT INSIDE OF A CUP AND FOURTH NOW ALLEGES THAT ABREN TOLD TO MR IVER THAT HE DONT WANT HIS MEDS. ABREN EXPLAINED CLEARLY TO MR JACKSON AND HIS POOL THAT MR IVER STATEMENTS ARE FALSE MANIPULATED AND FABRICATED. HE ALSO ACCUSED ABREN OF STRIKING TO RN LOCLAILA. HOWEVER ON 10/28/2015 MR IVER ALLEGED THAT HE SENT ABREN TO THE MH OBSERVATION, BECAUSE ABREN REPORTED HIM THAT HE WILL TO VIOLATE (ROPE) AND ASSAULT TO THE GRADAC LIBRARY LIBRARIAN TO BORROW AND ASSAULT STAFF. MR ABREN NEVER GIVE THIS STATE. - Went TO MR IVER HE DID SO ONLY FOR HE (MR IVER) TRY TO COVER UP THE REASONS. WHY HE SENT ABREN TO THE MH OBS. CELL, WHERE ABREN WAS PHYSICAL AND SEXUALLY ASSAULTED AND ROUSED BY GUARDS & SUPERVISORS & FOR TRY TO COVER UP HIS OWN MISCONDUCTS AGAINST ABREN FOR DENIAL ABREN MEDICAL CORPO REASID TO REPORT THE INCIDENTS (COVER UP STAFF MISCONDUCTS) NOW HE USE TO THE MH NURSES FOR WRITE AND FALSE STATEMENTS AGAINST ABREN, AND DISCONTINUE SO HIS MH. NEEDS.

135) THE DEFENDANT MR IVER ALSO DONT ALLOW TO ABREN TO TALK ABOUT THE SEXUAL & PHYSICAL ASSAULTS THAT HE HAS SUFFERED HE DENIED ABREN ALL CLASSES OF MENTAL HEALTH PROGRAM & TREATMENTS AND HE ALSO WROTE IN ABREN MENTAL HEALTH RECORDS, THAT ABREN TOLD HIM THAT HE WILL TO EXPOSE HIMSELF TO ALL FEMALE & MALE STAFF, FOR SO, HE CAN GO TO A PROGRAM. THIS IS NOT TRUE IN ALL

136) The Defendants Mr. Tuer, Ms. Jackson, Pink And Leclare Are 'a COCK IT - DPM Deliberate indifference To Abren Safety Security Health Care Well-being Welfare And Life. They Has placed To Mr. Abren in on imminent danger Mr. Abren will kill or harm himself for the Discontinuation of his MH Meds the which he need. He cannot sleep without it. He cannot concentration without it, He also feel stress & depressed and distressed of suffered a lot of flashback without his meds, but the Defendants only thinking in Retaliations, And unusual And cruel PUNISHMENTS' And Act of a Form COMPLICITY UNPROFESSIONAL AND WITHOUT ANY ETHICS in all.

137) The Defendants Collins, Ann Morda Sullivan, McCullach, O'MH, Docc, Adams, Annucci, Miller, Koenig, Frank, Hilton, Henning, Grant And Jackson Has further knowledges about Mr. Tuer, Ms. Jackson, Pink And Leclare misconducts And Retaliations And Discriminations against Mr. Abren. Also RN Pink also of the she denied Abren MH Meds, Alleged that Mr. Abren has refused his meds when this is not true in all And she encouraged others MH nurses to do so too. RN Pink she was also part of the conspiracy against Abren on 10/28/2015 when he was physical And sexually assaulted by Defendants Basile Lyons & MHU Cos. but she don't reported none of this. They (RN Pink & Leclare regularly has further knowledges of many inmates who have been assaulters in MHU 065 but they covered up on this too.

138) The Defendants MR. IVER ALSO HAS ORDERED TO THE MENTAL HEALTH SOCIAL WORKER, MS H. McCARTHY THAT SHE DON'T STOP FROM ABRON, THAT SHE DON'T TALK WITH ABRON FRONT HIS CELL, WHETHER IT HAS ORDERED OR REQUIRED TO THE SAME COUNSELOR MS WINNIE A SIMILAR REQUEST INCLUDING TO THE DSA PEACOCK AND THE ASSISTANT OF MENTAL HEALTH SERVICES MS COLLINS. THE DEFENDANTS DENIED ABRON REGULARLY ALL CLASSES OF COUNSELING SERVICES, ALL CLASSES OF MENTAL HEALTH SERVICES, AND OTHERS SERVICES IN THE SHU MS HOLD RECORDS SHE WALK IN THE SHU IN OMIX ROUND, IN LEAST 2 OR 3 TIMES IN THE WEEK OR CO. WINNIE SHE WALK FIVE(S) TIMES IN THE WEEKS, IN THE SHU AND DEFENDANTS MS COLLINS & MS. PEACOCK IN LEAST ONE TIME IN THE WEEKS, BUT THEY REFUSED TO TALK WITH ABRON, TO STOP FRONT HIS CELL AND DENIED HIM ALL SERVICES & IGNORED HIM AND HIS COMPLAINTS REGULARLY. SO ABRON IS DISCRIMINATED AND TREATED VERY DISRESPECTS TO OTHER INMATES IN THE SHU. IN SOME OR SIMILAR SITUATIONS, THE DEFENDANTS ALSO IF WALK NEAR OR FRONT OF ABRON CELL ARE ONLY ESCORTED BY SHU GUARDS/COR, WHO ALWAYS HARASS ABRON & THREAT HIM & LISTEN & WATCH THE CONVERSATIONS BUT THEY DON'T ESCORT TO WINNIE MCCARTHY, PEACOCK & COLLINS TO THE CELLS OF OTHERS PRISONERS, NO MATTER WHAT THEY DID IN THE

139) The Defendants WHITE, SHE ALWAYS DENIED ABRON ALL VIDEO TAPES & AUDIO RECORDS THAT ABRON HAS ASKED & REQUIRED TO SHE VIA THE FOIA REQUEST SHE REGULARLY DON'T ANSWER AND RESPOND TO ABRON FOIA REQUEST AND SHE HAS LEARNED OF THE VIOLATIONS AND HAS FURTHER KNOWLEDGE ALSO OF THE VIOLATIONS WHEN ABRON EXPLAINED IT IN THE FOIA REQUEST, INCLUDING THE DENIALS STICKER.

140) IF The Defendants white she worked
OR A Violation (Constitutional violations
Through OF A REPORT, Request, letter
Video Tapes & audio RECORDS but she
TRY TO COVER UP ALL THIS VIOLATIONS, BY
DENIED Abren COPIES OF THE VIDEO TAPES
& audio RECORDS OR she REASSED TO
PRESERVE IT EVIDENCE AND REASSED OR
DON'T ALLOWED Abren TO REVIEW IT VIDEO
TAPES, audio RECORDS AND OR DOCUMENTS
Then she IT PART OF THE VIOLATIONS OR
Abren Constitutional Rights, AND she become
ALSO LIBLE OF ALL THE VIOLATIONS. I HAVE
WRITE MANY TIME TO Defendant white ask
TO she TO PRESERVE THE VIDEO TAPES &
audios OF THE MEDICAL AND NURSING
NURSES DENIED Abren his medications OR
REFUSED TO DELIVER IT Abren, OR DENIED
Abren SICK CALL SERVICES OF INCIDENTS OR
VERBAL ASSAULTS THREATS HARASSMENTS OR
SEXUAL HARASSMENTS BY GUARDS IN THE SHR.
ONKED TO REVIEW ALL Abren INCIDENTS / ACCIDENTS
& COMPLAINTS, AND OTHER WORK REQUEST AND
she REVIEWED IT READ IT OBSERVED THE INCIDENTS
BUT she REASSED TO PROVIDE IT Abren, WITH THE
ONLY PURPOSE OF COVER UP STAFF ABUSES
MISCONDUCTS VIOLATIONS AND FOR AVOID THAT
Abren USE IT INFORMATIONS, EVIDENCE &
PROOFS IN LAWSUIT, COMPLAINTS & INVESTIGATIONS
SO, she become LIBLE OF THE VIOLATIONS TOO.

141) The Defendants MR BROWN AND HEYWOOD
AND ANNUCI Has ignore all Abren complaints
against HS white Has ignored Abren appeals
OR THE FOIL Request NOT PROVIDED of those
DENIED but they Has also refused TO PROVIDE
Abren Response & Answers to his Appeals, THEY
ARE ALSO LIBLE OF CONSPIRACY OF VIOLATIONS OF Abren Rights

142) The defendants MR THOMS AND MS PEACOCK alleged Abram that he has access to health care because all the nights the nurses' TO DELIVER TO HIM HIS MEDS, LIMITEC & CLORAZIN. However this defendants allegations don't have ANY MERIT in all, we have two kind of nurses in the SHU, one who DELIVER MEDICATIONS in the SHU who AND PICK UP THE SICK CALL SLIPS, REQUEST FROM THE CALL BOARDS ESCORTED BY SHU GUARDS FOR SICK-CALL SERVICES next day in the morning all sick call slips are PICKED UP in the nights. AND we have the MEDICAL NURSES who CONDUCT SICK CALL SERVICES in the SHU. The NURSE who DELIVER MEDS in the SHU, REGULARLY DON'T TALK OR SPEAK WITH INMATES DON'T STAND FRONT INMATE CELLS THAT DON'T RECEIVE MEDS, AND THEY ALWAYS HAS BAD ATTITUDES, AND when INMATES in the SHU TRY TO TALK WITH THEM THEY YELL OR SCREAM TO THAT INMATES along with THE CO'S THAT ARE SICK-CALL SLIPS IF THEY HAS ANY MEDICAL CONCERN/PROBLEMS.

143) Emergency sick call in the SHU is ONLY CONSIDERED CHEST PAINS IF THIS IS NOT CHEST PAINS, NURSES DON'T STAND FRONT ON INMATE CELLS. IF THE MEDICAL CONDITIONS IS OTHER ISSUES PROBLEMS RATHER THAN CHEST PAINS, THEN THE NURSES DIRECT TO THE INMATES TO FILE SICK CALL SLIPS & THE SHU CO'S/GUARDS DIRECT THE SAME TOO. SO THERE CAN SEE THE NURSE 100 TIMES DURING MEDS. AND THAT DON'T MEAN NOTHING IN ALL ALSO THIS NURSES READ DAILY/DAILY Abram SICK CALL SLIPS SO THEY KNOW THE PROBLEMS & THEN ARE THE SAME NURSES WHO ARE DENIAL ABRAM SICK CALL SERVICES. & DON'T PROVIDED HIM NOTHING IN ALL, SO, HE DON'T HAVE ACCESS TO CARE

144) The Defendants DR YUNA (DENTIST)
AND DR KORNANDY (FHSD) AND THE DR
KORNIGMANN & D'SILVA KNOW PRECISELY THAT ABRU
SUFFER OF A MOUTH GUM DISEASE &
INFECTIONS IN NEED OF DENTAL CLEANING SINCE
90 DAYS (3 MONTHS) THAT HE IS IN REGULAR
& CONTANTS PAINS & THAT HE IS IN NEED
OF STRONG PAINS MEDICATION FOR HIS TEETH
BUT THEY HAS DENIED ABRU SUCH DENTAL &
MEDICAL TREATMENT AND WONT UNCL TO TAKE
OFF ALL ABRU TEETH BECAUSE THEY DONT
WONT TO CLEAN ABRU MOUTH / TEETH THEY DONT
WONT TO PROVIDE ABRU WITH GOOD DENTAL
TOOTH PASTES & GOOD TOOTHBRUSH. THE TOOTH
BRUSH & TOOTH PASTES PROVIDED TO ABRU
IN THE SITES ARE INEQUATE & INAPPROPRIATE
AND FOR THIS REASONS ABRU IS NOW ALSO
SUFFERING OF A GUM DISEASE & INFECTIONS. ALSO
THE DEFENDANT MS D'SILVA DENTAL DIRECTOR IN
DOCS CENTRAL OFFICE IN ALBANY HAS IGNORED
ABRU COMPLAINTS IN THAT JAIL & TORTURES
& FAILED TO RESOLVE THEM & ACTED OUT OF
A FORM DELIBERATE & INDISCREET TO ABRU
MULTIPLY LETTERS COMPLAINTS & GRIEVANCES

145) ALL THE LACK OF THE DEFENDANTS BETWEEN
WANDE SULLIVAN & GREAT MEADOW & ALSO
WITH ALL THE LACK OF THE DEFENDANTS
BETWEEN DOCS ALBANY CENTRAL OFFICE &
OMH & CNY PC HAS CLEARLY VIOLATED ABRU
CONSTITUTIONAL RIGHTS AND CONTINUE VIOLATED
ABRU RIGHTS TO THE PRESENT WORKING IN AN
OPEN CONSPIRACY & IN RETALIATIONS EACH OTHER
OPENLY AGAINST MR ABRU, VIOLATED SO ABRU 1ST
4TH 8TH & 14TH AMEND RIGHTS, THE 18 USC § 241-5 & 42-
18 USC § 1519. 18 USC § 12417; 18 USC 1441 & 18 USC § 1391(b);
18 USC § 1091; § 28 USC § 509B, AND THESE CLAIMS ALL FROM WANDE
SULLIVAN & GREAT MEADOW CAN BE JOINED PURSUANT TO "FED R.CIV.P 18 & 20(a)"
AND UNDER THE ARTICLE III OF THE U.S. CONSTITUTION. § 53106

146) The Defendant Weston has from October 2015 to the present July 2016 harassed, intimidated, retaliated and discriminated to Mr. Abreu, has written false tricks and reports against Mr. Abreu, has made calculated campaigns of cell searches inside of Abreu cells, mishandled Abreu legal materials, throwing Abreu carbons - papers, envelopes and writing papers throwing Abreu personal correspondence, Christmas cards from Abreu family throwing Abreu religious meals, violated Abreu religious meals, refused to serving Abreu his religious meals, has called fucking pervert and others many nicknames don't allow to the medical nurses to the counselors and social workers to arrive front Abreu cells when he work in the site, has also denied to Abreu, his rights to 'recreations, showers and cell cleanings' also of time, & denied Abreu multiply time his rights ~~get~~ supplies in the site. And regularly to conspire against Abreu along with other staff of Defendants Mr. IVAN AND SGT. BOSQUE.

147) On June 128/2016 he conducted a cell search in Abreu cell mishandled Abreu legal papers & personal properties and took all Abreu religion foods and eye glasses case. On June 129/2016 he conducted another cell searches in Abreu he took Abreu writing pens and other items & mishandled ~~again~~ Abreu legal works/documents. On June 130/2016 he conducted another cell search while Abreu was in the shower he took Abreu can white bucket the which Abreu need for can clean his clothes. & clean. AND again mishandled Abreu legal materials. On July 05/2016 he again conducted another cell search while Abreu was in the shower and he also denied Abreu his lunch meals. (denied Abreu his foods.)

148) The Defendants Weston regularly go inside of Abreu cell every time MR Abreu has a call-outs appointments hearings showers interview ect out of his cell, on July 101/2016 he denied Abreu shower (taken shower or take his shower) on July 104/2016 C-O Weston observed Abreu writing this lawsuit / complaint. He saw him write and the names of others staff in Great Meadow C- and he go crazy had Anger and he started to threatening Abreu telling to Abreu this is more better if you take my name out of your lawsuit and stop or writing against me grievancer and complains and again other staff and MR Ives. I really like that guy so, there will be re-taliations against you, he continue threatening Abreu front his cell like for half hour after the lunch time.

149) next day on July 105/2016 while Abreu was inside of the shower in the unit the C-O Weston go inside Abreu cell looking for Abreu lawsuit (the complaint) for to take it or destroy it but Abreu has passed his lawsuit/complaint to his neighbour (N-127 cell) because Abreu feeling of automated that C-O Weston will do so. while Abreu was in the shower in the morning the C-O Weston he go inside Abreu cell throw all abreu legal papers in the flood mishandled it papers by papers. He appeared that he was looking for somethings. He took all Abreu asthma inhalers he bring to the nurse MS. M. von ORDER inside of Abreu cell she f C-O Weston wake inside Abreu cell due several misconduct against Abreu cell properties and legal materials and items.

150) The C.O. Weston has advised to the Defendants Von order that he saw her name also in the lawsuit/complaint. Several inmates witnesses in the SHU they saw to C.O. Weston and RN Von order inside of Abreu cell for several minutes - and several inmates in the unit were thinking that they were has sex inside of Abreu cell because they were talking and listen to 'RN. Von order' saying oh my God oh, my God after when she get out of 'Abreu cell' she was saying to C.O. Weston very loud oh Abreu has an shall Dick it, ha ha then C.O. Weston added listen he is in the shower right now - I will go to cover up his door the show so he covered up the shower door with a big feed up coat made of metal covered up the inmate door. Then when C.O. Weston escorted Abreu back to his cell he was threatened Abreu. And when he was removed Abreu hand cuff he used use of force and injured Abreu both hands of wrists. He denied Abreu medical care. The RN Von order, she denied Abreu sick call services too.

151) Abreu sustained injuries such as bruises cuts and a lot of pains of problems for move his hands of wrists. Abreu filed 'sick call' slips. Reported hit injuries and strong pains but he was denied of sick call services by the RN Von order of C.O. Weston who was also assigned to she again on 7/06/2016 C.O. Weston wrote a false report, trying to cover up the incidents also Abreu reported the incidents to the Defendants Basque Miller Williams Iver Easton, Telesco and Cleveland, and Brars and Viodyka of Sherrif Peacock in his rounds on 7/05/2016 7/06/2016 & 7/07/2016 they ignored also Abreu complaints, denied medical care and refused take photos of injury

152) The Defendants Brown · HAMILTON · MEYER ·
 Keenan · Lucas · MORA · HOGGER · LEMAKO · BLOKE ·
 AMBROSOLI · BÓZER · KILLINGER · KUA · BUKOWSKI ·
 FINK · FUCINA · FURLANI · GODFREY · GORNÝ · GROBEN ·
 HEERY · HILL · LEUTHÉ · LEVITT · LITTON · PACKER · RIVERA ·
 HOGGERT · ROBINSON · BEEBE · WESTON · HILTON · REDDING ·
 GRANT · IVES · PAÉ · JACKSON · PROLONO · KERONDI · THOMAS ·
 BROWN · BORGUE · NABORN · DÉPAUL · GONZALEZ · MELOCIO · MR ·
 EASTHORN · MILLER · CLEVEROLOIS · NORRIS · KOENIGSMANN · MR ·
 JACKSON · C. JACKSON · WILLIAMS · BIPPER · SCANTON ·
 VLADYKA · LOWRY · BYERS · LEONARD · KELLY · PEACOCK ·
 BURNETT · KELLY · G. WILLIAMS · SZABÓLCS · CÍMOLÓCZ ·
 WYZKÓWSKI · SÓWA · LISON · BOARI · C. NORRIS ·
 MONTER · D'SILVA · McCARTHY · WIANET · CHIEF OF OSZ ·
 SCHUMACHER · STIRK · STUBELOW · ADAMS · TOPOREK · WAHL ·
 ROMON · SKUBIS · MAYER · HAWK · MCGUIRE · HERZIK ·
 ROBERTS · WITTE · JOHNSON · JENTZ · URBAN · VASQUEZ · S.
 SIMMONS · WILSON · ASH · VONNER · HYLAND · PROCK · D.
 VETRITTOZZI · CROWLEY · BORRANI · HALL · HEDWOOD · ARLETT ·
 DIAZ · EGGLER · WIDOROWICZ · SULLIVAN · TELUSCO · DÍAZ ·
 EVANS · FREEMAN · REID · KRZYGIER · HERBINSKI · MAGNAR ·
 GREGOIRE · LUCAS · GEORGI · FERNOW · HEIT · LA PENNA ·
 DAVIS · LABECK · HAYDEN · MCKEE · HUNNING · BOSCO · K.
 ROSPOŁOCKI · LIPKA · HAVENS · RÓGUE · LAFRECH · PINK ·
 LECLAIRE · BRUNNER · VAN ORDER · WATKINS · A. SULLIVAN ·
 MCCULLAGH · BERNSTEIN · EFFRON · YOUNG · FINE · HOLLOWEN ·
 MONTER · KUINKON · NEW YORK STATE · N.Y. STATE AND
 N.Y.S. DOCCS · HAS CLEARLY VIOLATED ABRÉU (THE
 PLAINTECH 1ST, 8TH, 8TH, 14TH Amend Rights
 U.S. CONSTITUTION · THE AIR ACT · THE HUMAN RIGHTS
 THE INTERNATIONAL LAW · THE SHU BILLS · THE HEARTH SERVICES
 LAW · THE ADA AND REHABILITATION ACT AND THE
 TIAO II · THE BILL 4401, N.Y. ASSEMBLY BILL A 9939 ·
 THE PREA LAW · THE GENDER MOTIVATED VIOLENCE ACT ·
 THE ICCPR · ARTICLE 7 · ICESCR · ARTICLE 13 · THE UNITED
 NATIONS STANDARD FOR THE TREATMENT OF PRISONERS & THE BODY
 OF PRINCIPLES FOR THE PROTECTION OF ALL PERSONS UNDER LAW FOR
 OF DETENTION OR IMPRISONMENT & THE MANGA LAW · WITH THEM MILITARY
 ACTS · ABUSE · CONSPIRACY · RAPIDERS & DISCRIMINATIONS AGAINST CARLOS ABRÉU ·

CLAIMS FOR RELIEF [RELIEF REQUESTED]

WHEREFORE, Plaintiff requests that the Court grant the following relief:

A) Issue a declaratory judgment stating that:

1) The Defendants violated the Plaintiff's Rights under the 1st 4th 8th and 14th Amendment Rights, and violated the Due Process, cruel and unusual punishment, unusual or unconstitutional search and ~~pat frisk~~, religion rights, double jeopardy, the export ban law of the U.S. Constitution(s), and Human Rights.

2) The Defendants violated the Plaintiff's Rights under the Federal laws the ADA, the ADA and Rehabilitation Act, and of the Gender Motivated Violence Act (GMVA) and PREA Law, Bill A 9939^{N.Y.} Assembly

3) The Defendants violated the Plaintiff's Rights under state and Federal Regulations, Directives and Policies and of the DOCCS and OMH, § 87(2)(b) bill 8-Bill 4401

B) Issue an Injunction ordering Defendants to remove the Plexiglass/Cell shield from Abren cell door, to allow to Abren to clean his cell toilet, sink, and entire cell, to provide Abren a cell bucket and hot water, and cleaning supplies, to terminate the deprivations and special control cell and sign/dog tag exposure and remove it from his cell door such as unconstitutional, unlawful and illegal.

C) Issue an injunction ordering the Defendants OR their agents OR their successors in office, employees AND all other persons acting in concert AND participation with them

- 1) TO PROVIDE Abren with his pain medications Hand brace, Hand support / Back brace, orthopedic boots his eye glasses with STRAY LENS - his lesions, CLEARS FOR DRN SKINS his facial sprays. AND all necessary surgeries in his Right Hand, Right Arms AND / OR ORDERED all new TESTS AND EXAMINATIONS INCLUDING but not limited to MRI, Scan - scan.
- 2) TO PROVIDE Abren with all DR. MEDS. AND TREATMENTS FOR HIS TUBERCULOSIS. AND MEDICINES AND FINISH THE TREATMENTS
- 3) PROVIDE Abren with all necessities, PHYSICAL THERAPY FOR HIS RIGHT HAND, LOWER BACK, NECK AND LEFT FOOT/ANKLE
- 4) ALLOWED TO Abren to use AND HAVE AND KEEP HIS ORTHOPEDIC BOOTS IN THE SHOWER, FOR ALL CALLOUT, RECREATIONS, VISITS, & INTERVIEWS.
- 5) TO PROVIDE Abren with his psychiatric MEDS / MEDICINES STOP TO DISCONTINUE Abren MEDS / MEDICINES TO PROVIDE Abren with all necessities MENTAL HEALTH CARE TREATMENTS & PROGRAMS, EVALUATIONS AND EXAMINATIONS
- 6) TO PROVIDE Abren with ACCESS TO SICK CALL SERVICES STOP / Cease of DENYING Abren SICK CALL SERVICES STOP / Cease THE REVERBATIONS AND DISCRIMINATIONS FROM MEDICAL STAFF NURSES & DOCTORS

D) ISSUE AN INJUNCTION ORDERING THAT ALL TICKETS / REPORTS, HEARINGS AND SERVICES BE EXPUNGED FROM ABRON RECORDS

- 1) ORDERING THE DEFENDANTS TO STOP OR VIOLATED ABRON RELIGION AND RELIGIOUS BELIEF AND FOODS.
- 2) ORDERING THE DEFENDANTS TO PROVIDE ABRON BACK WITH A CAD KOSHER MEALS/ FOODS AND FOR THAT ABRON BE ALLOWED TO CHOOSE BETWEEN A CAD KOSHER TO A HOT KOSHER, SUCH AS TO DO GREEN HEAVEN.
- 3) ORDERING THE DEFENDANTS TO STOP THE RESTRICTED DIETS / LOADS AGAINST ABRON AND PROVIDE ABRON, PROPER, ASSURED AND NUTRITIVE DIETS.
- 4) ORDERING TO THE DEFENDANTS THAT WHEN ABRON IS PLACED IN LOADS OR DETS THAT ABRON / BLOOD PRESSURE WEIGHT OBSERVATIONS TALK AND MONITORING ABRON HEARTS BE CONDUCTED DAILY SUCH AS MONITORED & REGISTRED THE DOCS REGULATIONS, POLICIES HONOR / DIRECTIVE
- 5) ORDERING TO THE DEFENDANTS TO RETURN BACK TO ABRON TO REMOVE HEARTS LEVEL 1 BECAUSE THIS WAS REMOVED ONLY IN REGULATIONS AND IN BAD FAITH & INTENTIONALLY WITH THE ONLY PURPOSE OF HARM TO ABRON AND TO PUT TO ABRON TO SUFFER FOR LONGER MONTHS
- 6) ORDERING TO THE DEFENDANTS TO RETURN BACK ALL ABRON LEGAL MATERIALS, PAPERS, LEGAL BOOKS TO PROVIDE ABRON WITH ACCESS TO THE LAW LIBRARY, COURTS, LEGAL SUPPLIES, POSTAGE & LEGAL COPIES.

E) ISSUED AN INJUNCTION ORDERING THE DEFENDANTS, TO PAY TO ABREN WITH ALL DAMAGES; TO PERSONAL PROPERTIES LEGAL MATERIALS AND MISSING OF LOSS OR DESTROY OF PERSONAL PROPERTIES AND LEGAL MATERIALS.

1) ISSUED AN INJUNCTION ORDERING THE DEFENDANTS TO TRANSFER ABREN 27 BOYS OR LEGAL PROPERTIES / MATERIALS TO ANY SITE, AND PRISON(S), THAT ABREN BE TRANSFERRED IN THE FUTURE AND ALLOW TO ABREN, TO KEEP AND HAVE & RECEIVE SUCH LEGAL MATERIALS AND POWER OR ALL HIS ACTIVE CASES NECESSARIES TO HIS LAWSUITS, APPEALS, PROCEEDINGS & ACTIONS,

2) ISSUED AN INJUNCTION ORDERING ALSO TO DEFENDANTS TO PROVIDE ABREN WITH COUNSELLING AND MENTAL HEALTH SERVICES IN THE SITE THAT COUNSELORS WINNIE MCCARTHY, COLLINS AND PEACOCK STOP & CLOSE THEIR DIS-CRIMINATIONS, RETALIATIONS AND TREATMENTS DIFFERENTS, BETWEEN ABREN & OTHERS SITE INMATES.,

3) ISSUED AN INJUNCTION ORDERING TO THE DEFENDANTS TO STOP & CLOSE OR PLACE ABREN ONLY IN THE LAST CELL OR THE GALLERY / COMPANY OR THE SITE WHERE NO ONE TO WALK AND WHERE ARE REGULARLY DENIED ALL SERVICES & CONTACTS WITH STAFF IN THE SITE TO ABREN, AND THAT ABREN BE PLACED IN THE FRONT OR MIDDLE OR THE SITE GALLERIES WHERE HE CAN BE APPROPRIATED MONITORED WHERE HE CAN RECEIVE SICK CALL SERVICES - HAVE CONTACTS WITH MEDICAL & MENTAL HEALTH STAFF & COUNSELORS & OTHERS SITE SERVICES.

4) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PLACE OF THE VIDEO CAMERAS RECORDED OF ABRUZ IN THE MHTU OBSERVATION CELL, FOR SO AVOID FUTURE PHYSICAL & SEXUAL ASSAULTS.

5) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PLACE AND PLACED MR. ABRUZ BEING HIS VIDEOS CAMERAS FOR ALL CALL-OUT OUTSIDE OR HIS CELL FOR ALL MOVING APPOINTMENTS & HEARINGS OUT OR THE SITE VIDEOS CAMERAS. (IN OTHER WORDS WHEN ABRUZ IS IN THE SITE HE IS UNDER VIDEO CAMERAS & AUDIOS 24 HOURS, SEVEN (7) DAYS TO THE WEEKS, BUT WHEN HE IS ESCORTED OUT OF THE SITE, BY GUARDS NOW HE IS NO MORE UNDER THE PROVISIONS OF THE VIDEO CAMERAS & AUDIOS.)

6) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PROVIDE ABRUZ PROTECTIONS SECURITY AND SAFETY & HEALTH CARE, WELLBEING & WELFARE IN THE SITUATION, TO PROTECT CLASSES THE RETALIATIONS, DISCRIMINATIONS, HARASSMENT, ABUSER OF TORMOPER AND TO PROTECT ABRUZ FROM PHYSICAL ASSAULTS INJURIES AND SEXUAL ASSAULTS.

7) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PROVIDE ABRUZ WITH ALL HIS FOIL REQUEST FOR PRESERVATIONS REVIEW & BSY RECORDS. AND STOP/CEASE OF DENIED ABRUZ BY FOIL REQUESTS & STOP OR NOT RESPONDED OR ANSWERED TO ABRUZ FOIL REQUEST & APPEAL IN FACILITY LEVELS & 'CENTRAL OFFICE LEVELS.

F) ISSUE ON INJUNCTION ORDERING
TO THE DEFENDANTS TO PLACE 'F' PER
LOCKED secured Mail box of grievance
box in the SHU TO MONITOR TO THE
SHU CO. of STAFF who PICK UP THE
OUT going MAIL & FACILITY CORRESPONDENCE

- 1) ISSUED on Injunctions ORDERING
TO THE DEFENDANTS TO CONDUCT DENTAL
(Going in Abren hours EVERY 3 MONTHS
(90 days) FOR TO fight his GUM
DISEASE & INFECTIONS & TO PROVIDE
Abren with STRONG' PAINS MEDS FOR
TO fight THE PAINS in his TEETH &
PROVIDE Abren with all necessary MEDICINE
AND DENTAL TREATMENTS & COVERS, incase
also PROVIDED Abren with GOOD TOOTHBRUSH
AND GOOD TOOTH PASTES THAT HELP Abren TO
FIGHT THE DISEASE AND INFECTIONS TOO
- 2) ISSUED on Injunctions ORDERING TO
THE DEFENDANTS TO FILE CRIMINAL CHARGES
AND ORDER TO THE STAFF/GUARD WHO
HAS PHYSICALLY AND SEVERELY ABUSED
TO Abren (AND) Those who HAS COVERED UP
THESE ASSAULTS TO DISCIPLINE THEM &
TO DISCHARGE THEM FROM THE DOCS/OMH
- 3) ISSUED on Injunction ORDERING TO THE
DEFENDANTS TO Change Abren OMH THERAPIST
AND PSYCHIATRIST IN THE SHU AND TO
REMOVE FROM THE SHU TO THE OMH CLINIC
MR. IVER, MS. McCARTHY AND MS. POL
AND ASSIGN TO OMH CLINIC WHO FOLLOW THE
SHU BILLS THE PRIVATE RD COURT SETTLEMENT IN
People v. Fischer et al. Docket # 11cv2694 (SDNY)
AND DAI v. OMH/DOCS. SDNY: THE LAWS AND
THE CONSTITUTIONAL RIGHTS OF PRISONERS IN THE SHU,

WHEREFORE Plaintiff respectfully
demands judgments:

A) Demands for Punitive Damages
The actions of the Defendants described
above were extreme and outrageous.
And shock, the conscience of a
reasonable person. Therefore an award
of Punitive Damages is appropriate to
punish the Defendants for their cruel
and uncivilized conduct.

B) The Plaintiff hereby demands a
trial by jury or a trial with a
judge or a magistrate judge

C) Declaratory judgment that the
acts, policies and practices of the
Defendants, such as eg 42 USC § 1983 -
'deliberate' indifference to Plaintiff's
medical and mental health needs; cruel
and unusual punishment; interference with
legal rights; deprivation of due process;
failure to intervene; equal protection;
free exercise of religion; retaliation;
discriminations; intentional infliction of
emotional distress; under New York common law
negligent infliction of emotional distress under
New York common law; battery under New
York common law; force; imprisonment under
New York common law; conspiracy to interfere
with civil rights under 42 USC § 1985. violates
the Plaintiff's rights under the United States
Constitution. See also Human Rights Treaties, 63 FR 68991 (Executive
Order 13107)

D) Awarding Plaintiff Damages as a
result of Defendants' deliberate indifference
to Plaintiff's medical and mental

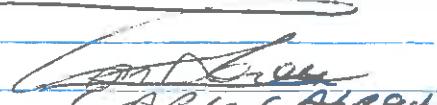
Health needs, cruel and unusual punishment, interference with legal mail, deprivation of due process, failure to intervene, violation of the equal protection clause, violation of plaintiff's right to freely exercise of religion, retaliation, intentional infliction of emotional distress, assault, sexual assault, battery, false imprisonments, false tickets, reports, and conspiracy, campaign of harassments, and discriminations, interference with access to the courts and law library of legal materials, legal personal, legal books, legal papers, legal books, in an amount to be determined on trial plus punitive damage or in the alternate compensatory damages AND punitive damages in the amount of \$ 25,000,000, (25 millions of dollars) from the defendants individual(s) and corporate entities including to the state of New York and this agency does only crys for the violations of the ADA and Rehabilitation Act, PREA law and the Gender Motivated Violence Act (GMVA) of Assembly Bill "4401/BILLAGB91

E) Awarding Plaintiff fees and costs, and disbursements

F) Appointment of personal counsel in this action pursuant to 28 USC § 1915

G) Granting Plaintiff such other and further relief as the court deems just & proper

Dated July 104/2016
Washington County New York


Carol A. S. Abren

VERIFICATION

STATE OF NEW YORK
COUNTY OF WASHINGTON)
)

Carlos Abren # 99A3027 being
Duly Sworn says:

I Am The Plaintiff above named
I Have Read The foregoing Complaint
against all the Defendants And know
ITS CONTENTS THE SAME IS TRUE TO MY
best knowledge excepts as to the
MATTER Therein stated to be alleged
On information And belief And as
TO Those matters I believe They And it
to be TRUE

Carlos Abren
CARLOS ABREN
PRO-SE
Great Meadow, NY

Pursuant to 28 USC § 1746 I declare
UNDER PENALTY OF PERJURY THAT THE
foregoing is true And correct.

Executed: on 7/07/2016

Carlos Abren
CARLOS ABREN
99A3027
PRO-SE
Great Meadow Cr
Box 51
Constock N.Y. 12821

07/07/2016

TO: Hon. Elizabeth A. WOLFORD
U.S. DISTRICT COURT Judge
WESTERN DISTRICT OF NEW YORK
100 State Street
Rochester, N.Y. 14614-1309

From: CARLOS ABREU
99A3027
SHER FL-29 cell
Great Meadow CF
Box 51
Constock, N.Y. 12821-0051

Subject: "AMENDED COMPLAINT"
Re: ABREU v. BROWN et al
Docket No. # 14cv-6599

Dear Hon. WOLFORD:

Enclosed please find the Amended Complaint, in the above action such as you have ordered. Please to order to the Clerk to file & process the Amended Complaint to provide me the necessary U.S. Marshal forms AND the summons for the service on the summons AND complaint in this action AND please to assign Abreu / to me a pro bono counsel who can to represent me in this action. Due to the serious of the violations, & due to the limitations that I have I have also ~~reduced~~ reduced the Complaint to 80 pages from 260 pages that ~~was~~ was the original Complaint & supplement (mailed on 7/7/2016). Thank you
Carlos Abreu (carlosabreu)